Appendix K
SHPO Correspondence

HISTORY Colorado

March 29, 2011

Ree R. Rodgers
Rocky Mountain Region
Preservation Officer
Department of Energy
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

Re: Proposed Plan to Rebuild the Granby to Windy Gap 69-kilovolt (kV) Transmission Line near Lake Granby, Granby County, Colorado and Addendum to Western Area Power Windy Gap Substation to Granby Pumping Plant 69kV Transmission Line Rebuild Project, Grand County, Colorado (CHS # 59259)

Dear Ms. Rodgers:

Thank you for your correspondence dated March 16, 2011 (received by our office on March 17, 2011) and the documentation regarding the subject project.

Following our review of the documentation provided, we offer the following comments:

- We concur with your determination that the following sites are **eligible** for the National Register of Historic Places (NRHP): 5GA3600, 5GA680, 5GA122, 5GA128, 5GA151, 5GA165, 5GA2398, 5GA2401 (supporting linear segment).
- We concur that a finding of **need data** is appropriate for the following sites: 5GA3585, 5GA3586, 5GA3589, 5GA3593, 5GA3595, 5GA3599, 5GA241, 5GA2774, 5GA673, 5GA2772, 5GA119, 5GA245, 5GA2312, 5GA671, 5GA219, and 5GA2398.
- We concur with your determination that the following sites are **not eligible** for the NRHP: 5GA3583, 5GA3584, 5GA3587, 5GA3588, 5GA3590, 5GA3592, 5GA3594, 5GA3596, 5GA3597, 5GA3598, 5GA3601, 5GA156, 5GA205, 5GA123, 5GA127, 5GA149, 5GA150, 5GA2055, 5GA2054, 5GA2049, 5GA152, 5GA666, 5GA163, 5GA2399, 5GA2400, 5GA2056, 5GA3241.2 (entire linear resource [5GA3241] is not eligible), 5GA3887.1 (entire linear resource [5GA3887] is not eligible), and 5GA3888.

In addition, we offer the following site-specific comments:

- 5GA120: We received a site map and vicinity map for site 5GA120 but no additional site documentation (Management Data form, Component form, etc.). Also, it is not listed in the Management Information Summary at the beginning of the inventory report. We would greatly appreciate having the documentation for this site and will need that before commenting on its eligibility.
- 5GA121: Our records indicate that this site is noted as likely a part of a large complex of sites which includes 5GA120, 5GA121, 5GA241, 5GA680, 5GA686, and 5GA687. This is

documented in GA.WC.R5 – "Windy Gap Water Development Project Data for Determinations of Eligibility on Six Prehistoric Cultural Resources" or GA.WC.R2 – "Windy Gap Archeological Report." We would greatly appreciate additional information about the possible relationship between these sites and recommend a finding of **need data** for this site at present.

- We did not receive any of the isolated find forms for the subject undertaking.
- 5GA238: We have no record that the site was officially determined not eligible in 1981, as stated within the reevaluation form provided. Additionally, we have no record of the testing that was conducted at the site in 2001. Finally, our records indicate that several radiocarbon dates have been obtained from this site, which suggests that it may be eligible under Criterion D as it "has yielded, or may be likely to yield, information important in history or prehistory." We recommend a finding of **need data** for the site at this time until these issues can be addressed.
- 5GA239: We have no record of the site recording conducted in 2001 as indicated on the reevaluation form. Additionally, our records indicate that several radiocarbon dates have been obtained from this site, which suggests that it may be eligible under Criterion D as it "has yielded, or may be likely to yield, information important in history or prehistory." We recommend a finding of **need data** for the site at this time until these issues can be addressed.
- 5GA243: The 2005 recording submitted for the original report recommends a determination of not eligible for this site, but the 2008 recording submitted along with the addendum report recommends a determination of eligible. The two recordings arrived concurrently within the same consultation package. We recommend a finding of **need data** for this site until this discrepancy can be addressed.
- 5GA245 and 5GA673: While we concur that a finding of **need data** is appropriate for these sites, we have no record of the site recordings conducted in 2001 as indicated on the reevaluation forms. We would greatly appreciate having this documentation for our records.
- 5GA2051: We recommend a finding of **need data** for this site. We have no record of the site recording conducted in 2001 as indicated on the reevaluation form. The most recent documentation of the site in 2003 actually recommended a finding of need data and stated, "testing was inconclusive because the majority of the site occurs on private property…The southern portion of the site especially needs more data to accurately assess the site's NRHP eligibility." It is unclear why the site was entered into our database as not eligible; however, we believe this to be in error. We agree with the recommendation that the site be tested to accurately assess its NRHP eligibility. We have no record of the statement that "previous testing indicates deposits are thin and eroded."
- 5GA2772, 5GA2774, 5GA2775, 5GA2776, 5GA2777: We have no record of the site recordings conducted in 2001 as indicated on the reevaluation forms. We recommend a finding of **need data** for these sites at this time.
- 5GA2773.1: While we concur that a finding of **need data** is appropriate for this linear resource (and segment) at this time, we have no record of the site recording conducted in 2001 as indicated on the reevaluation form.

A number of the sites documented for the subject project are noted as having been recorded in 2001, however, our office has never received the 2001 documentation. Additionally, the list of sites within the Management Information Summary form at the beginning of the report appears to be in no particular order. Finally, the site forms for those site recorded in association with the Addendum report were bound. These issues generally complicate and delay our review.

At this time, although there are a number of outstanding issues and questions as detailed above, we concur that a finding of **adverse effect** is appropriate for the proposed project. As such we look forward to further consultation regarding the development of a Memorandum of Agreement (MOA) to mitigate this adverse effect, as stipulated in 36 CFR 800.6. Please note that as stipulated in 36 CFR 800.6(1), the lead agency shall notify the Advisory Council of the adverse effect finding.

Thank you for the opportunity to comment. We look forward to continued consultation on the subject project. If we may be of further assistance, please contact Shina duVall, Section 106 Compliance Manager, at (303) 866-4674 or shina.duvall@chs.state.co.us.

Sincerely,

Richard A. Wilson, for

Edward C. Nichols
State Historic Preservation Officer
ECN/SAD