

**From:** John Kessler  
**To:** Docket Optical System  
**CC:** Beverly Bastian; Lisa DeCarlo; Robert Worl  
**Date:** 6/3/2008 3:13 PM  
**Subject:** Fwd: request for letter re CCC, HBRP, and historic resources

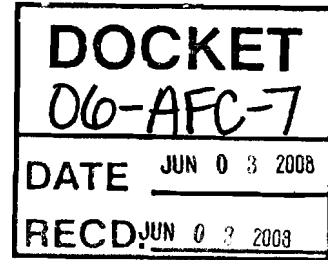
Dear Docket Staff:

Please docket this email to HBRP (06-AFC-7).

Thank you,

John

John S. Kessler  
 CEC - Project Manager  
 Office: 916-654-4679  
 Cell: 530-306-5920  
 Fax: 916-654-4421



>>> Beverly Bastian 6/3/2008 1:31 PM >>>

Hi Tom,

This request is a follow-up to our telephone conversation of this morning.

As a result of the Energy Commission's review of the application of PG&E for a license to repower a thermal power plant on Humboldt Bay (a project referred to as the Humboldt Bay Replacement Project, or HBRP), the Energy Commission Cultural Resources staff has identified a significant historical resource, the Humboldt Bay Power Plant Historic District (or HBPPHD), consisting of all of the facilities of the Humboldt Bay Power Plant constructed before August, 1963. Staff has also identified the eventual demolition of Units 1 and 2 (which are major contributing elements of the identified significant historic district) and their associated structures as a significant indirect impact, under CEQA, of the HBRP, necessitating mitigation in the form of recordation of the HBPPHD according to Historic American Engineering Record standards.

PG&E is requesting that the Energy Commission not adopt staff's analysis, but instead defer the analysis of significance and identification of any mitigation measures to the California Coastal Commission, claiming that the Coastal Development Permit (CDP) process, at some later but unspecified date, is the appropriate venue for considering this issue.

Consequently, I am requesting a formal letter from you, on behalf of the California Coastal Commission, addressing the following issues:

- \* The Coastal Commission's statutory oversight on historic-period cultural resources, in particular those of the built environment;
- \* The Coastal Commission's policy regarding formal consultation with the State Historic Preservation Officer (SHPO) with respect to identifying and evaluating historic-period cultural resources during the processing of a CDP application;
- \* For the Humboldt Bay Power Plant, the relationship between the Coastal Commission and Humboldt County with respect to CEQA review for a CDP and how that could affect the identification and evaluation of historic-period cultural resources during the processing of a CDP application; and
- \* The opinion of the Coastal Commission on whether the CDP process is the most appropriate venue for considering the significance of historic Humboldt Bay Power Plant Units 1 and 2 and associated structures and the need to provide mitigation for their demolition.

Due to a formal hearing before the Energy Commissioners regarding this matter, scheduled for June 17, I must ask you to expedite your letter. It would be most helpful to have the comments by June 6, 2008, if possible.

Please call me at the number below if you would like to further discuss this request, and thank you for your willingness to provide this letter and for your timely response.

Beverly

Beverly E. Bastian  
 Planner II  
 California Energy Commission  
 Energy Facilities Siting Division  
 1516 9th St., MS 40  
 Sacramento, CA 95814-5512  
 (916) 654-4840