

STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission

DOCKET 06-AFC-7	
DATE	JUN 06 2008
RECD.	JUN 06 2008

In the Matter of:

Application for Certification
for the Humboldt Bay Repowering Project

Docket No. 06-AFC-7

Energy Commission Staff's Notice Regarding Designation of Alternate Witness

At the May 28, 2008 Prehearing Conference, staff indicated a possible need to designate an alternate Cultural Resources witness for evidentiary hearings. The Committee directed staff to file any such notification at least one week before the evidentiary hearing. This filing serves to notify the Committee and parties that staff is designating Amanda Blosser and Dorothy Torres as its expert witnesses on Cultural Resources for the upcoming evidentiary hearing. Their declarations and qualifications are attached.

Additionally, because of questions raised by the applicant regarding the appropriateness of analyzing the potential demolition of Units 1 and 2 in this proceeding, staff has sought comments from the California Coastal Commission and the State Historic Preservation Office. The two documents requesting comments have been docketed and are attached. Staff will notify the Committee and parties immediately upon receipt of a response from either agency.

DATED: June 6, 2008

Respectfully submitted,



LISA M. DECARLO
Senior Staff Counsel
California Energy Commission
1516 9th Street
Sacramento, CA 95814
Ph: (916) 654-5195
E-mail: ldecarlo@energy.state.ca.us

**DECLARATION OF
Amanda Blosser**

I, Amanda Blosser, declare as follows:

1. I am presently employed by the California Energy Commission in the Siting Office of the Energy Facilities Siting Division as a Cultural Resources Specialist (Planner II).
2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.
3. I have read Cultural Resources Section for the Humboldt Bay Repowering Project Final Staff Assessment and based on my independent analysis of the Application for Certification and supplements thereto, data from reliable documents and sources, and my professional experience and knowledge agree with the staff conclusions and I am willing to testify in support of these conclusions.
4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue(s) addressed therein.
5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 06/04/08

Signed: 

At: Sacramento, California

Amanda Blosser

Planner II, California Energy Commission
1516 9th Street
Sacramento, CA 95814
916.654.4884
Ablosser@state.energy.ca.gov

Summary of Qualifications

Ten years experience in the field of historic preservation and cultural resource management. Expertise includes survey of architectural and engineering resources, assessment of effects on historic resources, and preparation of local and state landmark applications.

Professional Experience

California Energy Commission, Planner II, Environmental Office-Facilities Siting, May 2008-present.

Perform technical analysis for complex facility siting cases and planning studies in the area of cultural resources for Applications of Certification and Small Power Plant Exemptions.

California Office of Historic Preservation, Staff Historian II/, Project Review Unit, November 2005- present.

Major responsibilities include reviewing and providing comment, both from an academic and regulatory perspective, on project impacts to cultural resources, assessment of adequacy of reports prepared for review, recommending revisions to submission, and prepare agreement documents to resolve adverse affects to cultural resources, assists federal agencies in completing compliance with National Historic Preservation Act.

JRP Historical Consulting Services, Staff Historian II/Architectural Historian II, October 16, 2001- present.

Major responsibilities include inventory and evaluation of historic resources, preparation of environmental documents and other reports regarding compliance with state and federal environmental regulations and policies, undertaking site specific and general historical research, writing and compiling physical descriptions and integrity assessments of historic resources for historic property surveys, prescribing mitigation measures for historic resources as necessary and completing mitigation measures, assisting or training other staff in historical research methods and techniques. Other work related experience includes client and review agency coordination, project management, approaches, project budgets and schedules, proposals for projects, managing multiple projects and staff members, interaction with clients and various federal, state, and local agencies and the public.

Independent Architectural Historian and Preservation Planner, August 15, 1999-September 15, 2001.

Projects while an independent contractor encompassed preparation of small inventory and evaluation and historic architecture survey reports for city planning organizations and other municipal agencies, preparation of National Register of Historic Places nomination forms,

Amanda Blosser

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preparation of Federal Tax Credit applications, and authoring land use histories. Additional project work included participating in design guideline recommendations for historic resources during master planning process.

Student Intern, Colonial Williamsburg, Architectural History and Material Conservation Departments, January 21, 1999-April 15, 1999.

Responsibilities included completion of research tasks for staff, undertaking paint analysis, conservation of objects, and preparation of written documentation. All work was undertaken under supervision of Architectural Historians and furniture conservators.

Ft. Davis National Historic Site, Student Architectural Conservator, June 15, 1998-August 15, 1998.

Responsibilities included preparation of written and photographic documentation, conducting condition assessments, undertaking plaster and paint stabilization and consolidation for historic structures within the Ft. Davis National Historic site. All work was undertaken in conjunction with additional architectural conservators and student architectural conservators.

Teaching Assistant, Texas Tech University, Architecture History, January 21, 1998 - May 15, 1998.

Education

Bachelor of Arts in Art History, University of Texas, Austin, 1995.
Undergraduate Deans' Research Scholarship Recipient, 1995.

Master of Science in Architecture, Historic Preservation, Texas Tech University, 1999.
Thesis: *Paint Analysis at Colonial Williamsburg, An Evolution of Technique.*

Los Rios Community College, GIS Applications certificate, currently enrolled.

Professional Memberships and Community Activities

Vice-President, Northern California Chapter of the Society of Architectural Historians.

Presenter, "Restoring Wood Windows," September 2005, 2006, 2007 at various locations.

Presenter, "Researching Your Historic Property," *Fainted Ladies Restoration Seminar*, October 16, 2004.

Society of Architectural Historians.

DECLARATION OF

Dorothy Torres

I, Dorothy Torres declare as follows:

I am presently employed by the California Energy Commission in the Environmental Office of the Facilities Siting Division as a Planner II.

A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

I reviewed the draft Final Staff Assessment on Cultural Resources for the Humboldt Bay Repowering Project based on my independent analysis of the Application for Certification and supplements thereto, data from reliable documents and sources, and my professional experience and knowledge.

It is my professional opinion that the prepared testimony is valid and accurate with respect to the issues addressed therein.

I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 6/6/08 Signed: Dorothy Torres

At: Sacramento, California

Dorothy E. Torres

EXPERIENCE:

September 2002-
Present

Planner II: Biology and Cultural Unit,

Facilities Siting Division, California Energy Commission.

Duties: As a Planner II, I identify, describe, and analyze complex cultural resources issues related to electrical energy production facilities, alternative energy technologies, energy research and development and Commission programs. This includes the preparation of sections of initial studies, environmental impact reports and Commission reports.

In addition, I prepare independent assessments of the cultural resources aspects of Notices of Intention, Applications for Certification, and Small Power Plant Exemptions. The final analyses include the preparation and presentation of expert technical testimony, which is presented at Commission hearings.

I also coordinate and work with federal, state, regional and local governments; cultural resources related agencies; environmental organization and universities; Native American or other ethnic groups; archaeological or historical professional organizations; and members of the general public regarding energy-related issues to assure their input into the Commission power plant siting process and other Commission programs.

Moreover, I lead or participate in workshops and meetings concerning Commission projects, programs and policies, amongst and between project applicants, staff, other governmental agencies, private organizations, and the public.

In addition, I examine and evaluate existing and proposed laws, ordinances, regulations, standards, and policies pertinent to the visual, cultural aspects of proposed energy facilities on Commission programs. After permitting, I evaluate the licensee's compliance with conditions of certification for power plant facilities.

April 2001-
August 2002

Planner I: Cultural, Socioeconomic and Visual Unit,

Systems Assessment and Facilities Division, California Energy Commission. Duties: I gather, organize and analyze cultural resources data and identify issues, impacts and mitigation measures ensuring compliance with the California Environmental Quality Act. I provide oversight for consultants working on siting applications in the area of cultural resources. I participate in workshops and meetings concerning Energy Commission projects and programs. In addition, I interact with Division technical staff and staff representing other Divisions, local and regional government staff/decision makers, federal and state agency representatives and consultants/experts in the areas of anthropology, archaeology, history and related fields. I prepare written assessments of energy related documents.

December 1998-
March 2001

Energy Analyst: Community and Cultural Resources Unit, Energy Facilities Siting and Environmental Protection Division, California Energy Commission. Duties: I assist in gathering, organizing and analyzing cultural resources data and identify issues, impacts and mitigation measures. I assist in coordinating with local governments, resource protection agencies, environmental organizations and business organizations. Furthermore, I participate in workshops and meetings concerning Energy Commission projects and programs. I evaluate existing and proposed laws, ordinances, regulations, standards, and policies pertinent to the cultural resource aspect of proposed energy facilities. I prepare written assessments of energy related documents.

EDUCATION:

Spring 1988	M.A., Anthropology California State University, Sacramento
Spring 1980	B.A., Anthropology and History California State University, Sacramento
Professional Organizations	Society for California Archaeology Sacramento Archaeological Society

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

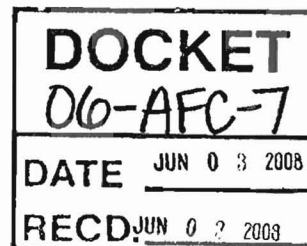
Dear Docket Staff:

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

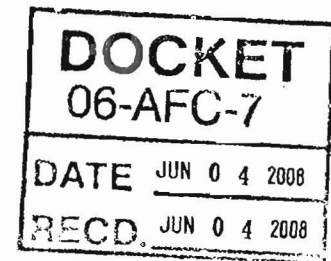
CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



June 4, 2008

Mr. Wayne Donaldson
Attn: Ms. Michelle Messinger
CEQA Coordinator
State Historic Preservation Office



Dear Ms. Messinger,

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, located near Eureka, California), 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 making the old units obsolete. Consequently, staff has recommended mitigation in the form of recordation of the HBPPHD according to Historic American Engineering Record standards. Conditions of certification for this project would require the applicant to consult the HABS/HAER/HALS coordinator of the National Parks Service Pacific West Regional Office for the production of the HAER document.

Energy Commission Cultural Resources staff would like to request that the SHPO formally review and comment on staff's recommendation of the proposed Humboldt Bay Power Plant Historic District (HBPPHD) for NRHP eligibility and on the appropriateness of the proposed mitigation for the resolution of the significant impacts to this historical resource.

Staff is requesting this review because PG&E has, staff believes, unreasonably rejected staff's recommendation of NRHP eligibility for the HBPPHD and has questioned the appropriateness of staff's recommendation of mitigation measures for the demolition of contributing elements of the historic district.

Staff believes that commenting on this project, although not required, would be of interest to the State Historic Preservation Office because it offers an opportunity for the Office to recognize and endorse the potential for national significance in often-overlooked and undervalued industrial infrastructure, possibly creating a useful example for CEQA lead agencies, both state and local.

The Humboldt Bay Power Plant Historic District is located on a 143-acre parcel at 1000 King Salmon Highway in Eureka, CA. The facility consists of three electrical generating

elements: 1) natural gas-and oil-fired power plants consisting of two steam turbine-generators (Units 1 and 2), which began operation in 1956 and 1958; 2) a currently retired nuclear-powered boiling water reactor generating unit (Unit 3), which began operation in 1963, and two mobile emergency power plant backup and peaking units of later date. There are a number of other appurtenant facilities that are integral to the operation of the power plant that have been identified as contributors to the historic district as well.

California Energy Commission Cultural Resources staff believes that the Humboldt Bay Power Plant Historic District is eligible for inclusion in the NRHP and CRHR at the national level of significance under Criteria A and C. It is eligible under Criterion A because it was the first and only conventional-plus-nuclear-configured power plant in the country in the pioneer commercial nuclear power plant period. Units 1, 2, and 3 combined conventional thermal and nuclear thermal technology to cost-effectively provide commercial electrical power to a transportation-challenged region, exemplifying a technological solution applicable to other geographically isolated parts of the country and providing an early illustration of the idea of economy of scale applied to nuclear power generation. The HBPPHD is also significant under Criterion A because of Unit 3's distinction as the first economically viable commercial nuclear power plant in the nation.

Under Criterion C, the Humboldt Bay Power Plant Historic District is significant because it exemplifies the conventional fossil-fuel and nuclear-fueled, electricity-generating power plants of the 1950-1970 era. The HBPPHD is also significant under Criterion C because of Unit 3's innovation and cost-effective containment vessel design and construction method and because of the unique engineering design of the steam drums of Unit 1 and 2 and because Unit 1 and 2 are good examples of 1950s California once-through-cooled, steam-electric- power plants.

CEC staff has defined the period of significance for the district as 1954-1963, beginning with the construction of Units 1 and 2 and ending when Unit 3 came on line in 1963. The proposed boundaries of the district consist of the 53 acres of the Humboldt Bay Power Plant enclosed within the property's fence. Staff identified 31 contributing elements to the historic district and 18 non-contributing elements.

For more detailed information for your review, please follow this link <http://www.energy.ca.gov/2007publications/CEC-700-2007-020/CEC-700-2007-020-FSA.PDF> and see:

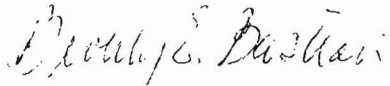
- pages 176-192 for historical context and evaluation of the historic district's significance,
- pages 198-200 for evaluation of project impacts and recommended mitigation, and
- pages 232-236 for lists of contributors and non-contributors.

Due to a formal hearing before the Energy Commissioners regarding this matter, scheduled for June 17, staff must ask for an expedited review. If the Office is able to

review this project, it would be most helpful to have the comments by June 10, 2008. If you would like to discuss this request further, please call the number below.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in cursive script that reads "Beverly E. Bastian".

Beverly E. Bastian

Planner II
Biological and Cultural Resources Unit
Environmental Office
Energy Facilities Siting Division
California Energy Commission
(916) 654-4840

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE
STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION FOR THE
HUMBOLDT BAY REPOWERING PROJECT
BY PACIFIC GAS AND ELECTRIC COMPANY

Docket No. 06-AFC-7
PROOF OF SERVICE
(Revised 3/21/2008)

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 06-AFC-07
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

APPLICANT

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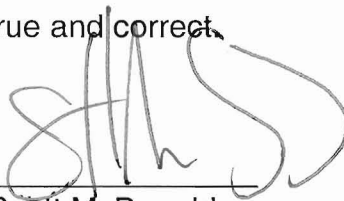
DECLARATION OF SERVICE

I, Scott McDonald, declare that on June 6, 2008, I deposited copies of the attached Energy Commission Staff's Notice Regarding Designation of Alternate Witness in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.



Scott McDonald