

**CALIFORNIA ENERGY COMMISSION**1516 NINTH STREET  
SACRAMENTO, CA 95814-5512

March 26, 2009

Mr. Ken Speer, Assistant General Manager  
Northern California Power Agency  
108 Cirby Way  
Roseville, CA 95678**RE: LODI ENERGY CENTER PROJECT (08-AFC-10)  
DATA REQUEST SET 3 (# 13 Supplement)****DOCKET  
08-AFC-10**DATE MAR 26 2009RECD. MAR 26 2009

Dear Mr. Speer:

Pursuant to Title 20, California Code of Regulations, Section 1716, the California Energy Commission staff seeks the information specified in the enclosed data request. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This data request (#13 Supplement) is being made in the area of cultural resources. It was initially part of the first round of data requests on December 10, 2008, which addressed the need for information on the historical geomorphology of the project area to assess the potential for buried archeological deposits. However, based on a recent factual exchange and clarification discussion on March 11, 2009 with Northern California Power Agency's consultant, staff is seeking additional information in this area. We would appreciate your written response to the enclosed data request on or before April 26, 2009, or at such date as may be mutually agreeable.

If you are unable to provide the specific information requested, need additional time, or object to providing requested/specific information, please send a written notice to both Commissioner Karen Douglas, Presiding Committee Member for the Lodi Energy Center Project, and to me, within 20 days of receipt of this letter. If sent, this notification must contain the reason(s) for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please call me at (916) 654-5191 or email me at [rjones@energy.state.ca.us](mailto:rjones@energy.state.ca.us).

Sincerely,

**Original signed by**Rod Jones  
Project ManagerEnclosure  
cc: Docket (08-AFC-10) and POSPROOF OF SERVICE (REVISED 02/17/09) FILED WITH  
ORIGINAL MAILED FROM SACRAMENTO ON 03/27/09

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# **LODI ENERGY CENTER (08-AFC-10) DATA REQUEST 13 SUPPLEMENT**

## **Technical Area: Cultural Resources**

**Author: Bright Eastman and Michael D. McGuirt**

### **BACKGROUND**

The first round of data requests on December 10, 2008 (Data Requests 1 through 55), included Data Request 13, which addressed the need for information on the historical geomorphology of the project area to assess the potential for buried archaeological deposits. The applicant provided a response that did not sufficiently respond to the request.

In a conference call with the applicant's representatives on March 11, 2009, Geoff Spaulding, Ph.D. consultant to the applicant, responded to staff's request for clarification by indicating that the geotechnical studies in the AFC do not provide the data needed to answer staff's specific questions about the history of the sediment sequence (the stratigraphy) of the project area. Dr. Spaulding also responded that surface observation of the project area would not provide the data necessary to provide the clarification that staff seeks, because there are no natural or artificial exposures of project area stratigraphy. Staff asked whether excavation of a limited number of trenches would yield the necessary information, and Dr. Spaulding agreed that trenching would be likely to yield that information.

Staff needs clarification on specific points that help to articulate the particular depositional history of the project area sediment sequence to better assess the likelihood of buried prehistoric resources. Completing the requested field geoarchaeological study could either reduce the project's archaeological monitoring requirements or focus them more efficiently and cost effectively than would otherwise be possible.

### **DATA REQUEST 13 SUPPLEMENT**

Please conduct a geoarchaeological field study that examines the landforms in the project area that, on the basis of age and evident processual geomorphic origin, may contain archaeological deposits. Staff recommends that the geoarchaeological field study of the project area include the following:

- a. excavation of at least three backhoe trenches in locations across the project area that will provide the opportunity to reliably characterize the stratigraphy of the project area to the anticipated maximum depth of the proposed construction;
- b. complete recordation of one prepared profile from each backhoe trench to include reasonably detailed written descriptions of each lithostratigraphic and pedostratigraphic unit in each profile, a measured profile drawing, and a profile photograph with a metric scale;
- c. screening of a small (3, 5-gallon buckets) sample of sediment from the major lithostratigraphic units in each profile, or from 50-centimeter arbitrary levels down each profile, through 1/4-inch hardware cloth;
- d. collection and assaying of enough soil humate samples to reliably radiocarbon-date a master stratigraphic column for the project area; and

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- e. an analysis of the data that are the result of the above field study and the original literature review that is the basis for the extant response to Data Request 13, and an assessment, on those bases, of the likelihood that the project will encounter buried archaeological deposits, and, to the extent possible, the likely age and character of such deposits.



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – [WWW.ENERGY.CA.GOV](http://WWW.ENERGY.CA.GOV)**

**APPLICATION FOR CERTIFICATION  
FOR THE *Lodi Energy Center***

**DOCKET No. 08-AFC-10**

**PROOF OF SERVICE  
(Revised 2/17/09)**

**APPLICANT**

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**INTERESTED AGENCIES**

California ISO  
[e-recipient@caiso.com](mailto:e-recipient@caiso.com)

**INTERVENORS**

**ENERGY COMMISSION**

Karen Douglas  
Chairman and Presiding  
Member  
[kldougla@energy.state.ca.us](mailto:kldougla@energy.state.ca.us)

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**DECLARATION OF SERVICE**

I, April Albright, declare that on March 27, 2009, I served and filed copies of the attached Lodi Energy Center Project (08-AFC-10) Data Request Set 3 (#13 Supplement), dated March 26, 2009. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

**[[www.energy.ca.gov/sitingcases/lodi](http://www.energy.ca.gov/sitingcases/lodi)]**. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

**(Check all that Apply)**

**FOR SERVICE TO ALL OTHER PARTIES:**

- sent electronically to all email addresses on the Proof of Service list;
  
- by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

**AND**

**FOR FILING WITH THE ENERGY COMMISSION:**

- sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

**OR**

- depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 08-AFC-10  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

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

Original signed by \_\_\_\_\_  
**April Albright**