In reviewing the applicant's responses to Data Requests (DR) 24 - 49, staff sought clarification from the applicant's cultural resources consultant regarding the response to DR-27, in particular.

DR-27 requested more details regarding ground disturbance and excavation dimensions for the on-and offsite linear facilities. In response to DR-27, the applicant provided Table DR27-1, which clarified the widths of disturbance for each linear facility. However, in examining the cultural resources survey coverage map (Figure 1), which was provided in the cultural resource technical report submitted in the AFC, staff noticed what appeared to be a discrepancy with the widths provided in Table DR27-1. While Table DR27-1 provided three different corridor widths for the three linear facilities, Figure 1 depicted the survey coverage for each corridor as the same width. Staff, therefore, sought clarification as to the maximum width of disturbance for each corridor, as well as whether or not a 50-foot buffer was surveyed on either side of the corridors. Staff spoke with Mr. Clint Helton, who looked into the matter and found that the CEC-required 50-foot buffer had not, in fact, been surveyed for the transmission line.

Mr. Helton indicated that the 100-feet corridor for the transmission line was the maximum width of construction disturbance. Furthermore, he indicated that the entire project area had been subjected to at least two prior cultural resources surveys, which resulted in negative findings.

Based on the record search results, as well as the geoarchaeological assessment prepared for the project, the overall cultural resource sensitivity of the project area and its vicinity is considered to be very low. In addition, Mr. Helton has indicated that the 100-foot corridor for the transmission line is the maximum width of disturbance for the project's construction and operation. Staff has, therefore, concluded under the circumstances that it would not be necessary for the applicant to revisit the project area to survey the 50-foot buffer on either side of the 100-foot transmission line corridor.