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CALIFORNIA ENERGY COMMISSION

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November 12, 2013

Stephen O'Kane
AES Southland, LLC
690 Studebaker Road
Long Beach, CA 90803

Regarding: **REDONDO BEACH ENERGY PROJECT (12-AFC-03)**
DATA REQUEST SET 1B (Nos. 48-66)

Dear Mr. O'Kane,

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. 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 set of Data Requests (Nos. 48-66) is being made in the technical areas of: Alternatives (Nos. 48-51) and Cultural Resources (Nos. 52-66). Written responses to the enclosed data requests are due to the Energy Commission staff on or before December 12, 2013.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to the Committee and me within 20 days of receipt of this notice. The notification must contain the reasons for the inability to provide the information or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions regarding the enclosed data requests, please call me at (916) 654-4063.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Kelly".

Patricia Kelly, Siting Project Manager
Siting, Transmission and Environmental
Protection Division

Enclosure (Data Request Packet)
cc: Docket (12-AFC-03)

**REDONDO BEACH ENERGY PROJECT
(12-AFC-03)**

**Energy Commission Staff's Data Requests Set 1B (Nos. 48-66)
November 12, 2013**

**REDONDO BEACH ENERGY PROJECT (12-AFC-03)
DATA REQUESTS – SET 1B**

Technical Area: Alternatives
Authors: Negar Vahidi, Scott Debauche

BACKGROUND

Section 6.5 of the Application for Certification (AFC) states (p. 6-4):

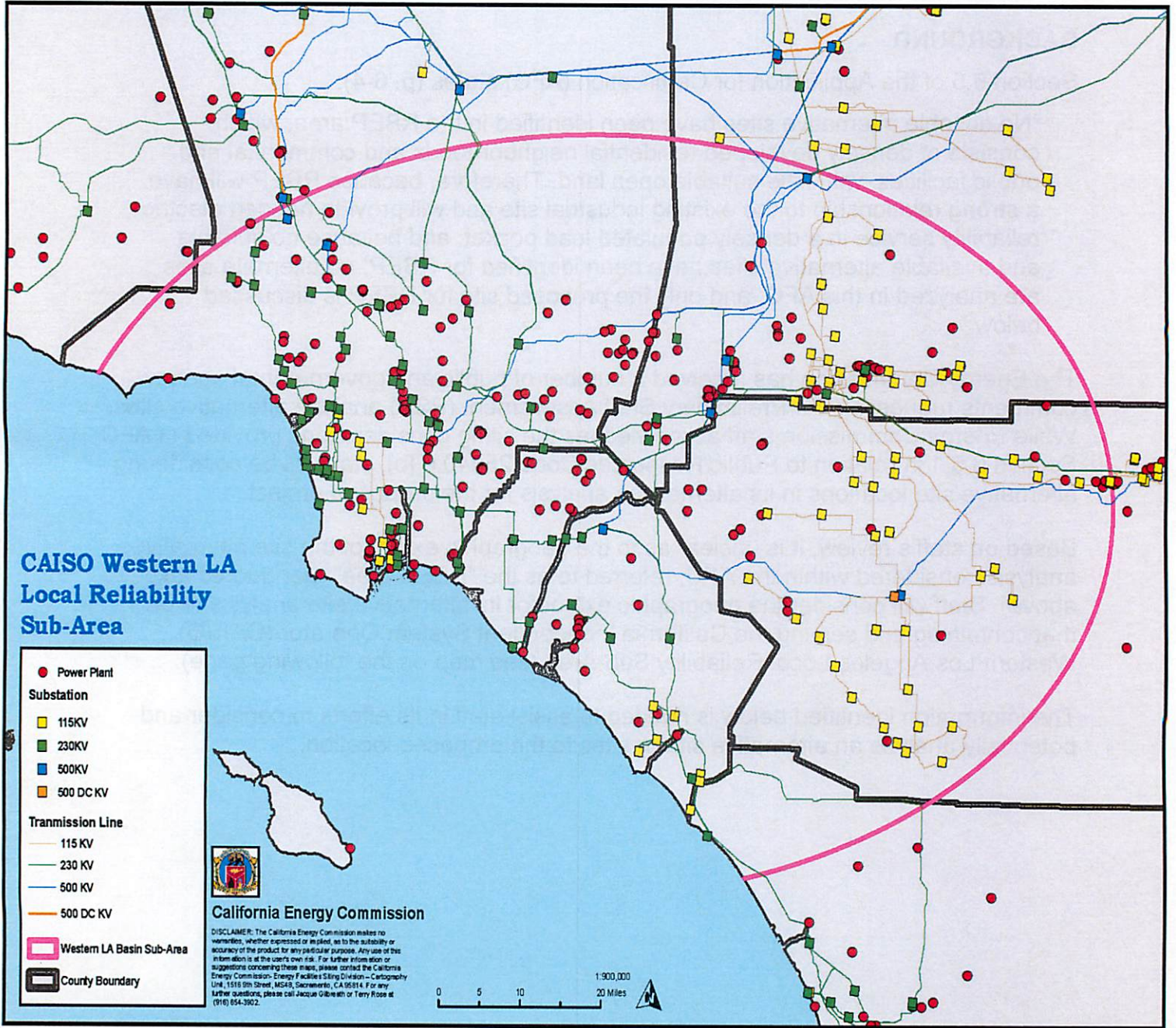
“No suitable alternative sites have been identified in the RBEP area, which consists of densely developed residential neighborhoods and commercial and public facilities, with little suitable open land. Therefore, because RBEP will have a strong relationship to the existing industrial site and will provide needed electric reliability service in a densely populated load pocket, and because no suitable and available alternative sites have been identified for RBEP, no alternate sites are analyzed in this AFC, and only the proposed site for RBEP is discussed below.”

The Energy Commission has received a number of public and governmental agency comments requesting the Preliminary Staff Assessment (PSA) analyze alternative sites. While Energy Commission staff acknowledges the siting considerations provided in AFC Section 6.5.1 in relation to Public Resources Code 25540.6 [b], staff will be considering alternative site locations in its alternatives analysis for the proposed project.

Based on staff’s review, it is unclear as to the geographic extent of the site alternatives analysis considered within the AFC, referred to as the “RBEP area” (per quoted text above). Staff will consider the geographic extent for its alternative site analysis to be that containing and serving the California Independent System Operator (CAISO) Western Los Angeles Local Reliability Sub-Area (see map on the following page).

The information identified below is needed to assist staff in its efforts to consider and potentially analyze an alternative site or sites to the proposed location.

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CAISO Western Los Angeles Local Reliability Sub-Area

DATA REQUESTS

48. Please identify alternative site(s) within the CAISO Western Los Angeles Basin Local Reliability Sub-Area that provide adequate size to site a 496 megawatt (MW) facility similar or identical to that of the proposed RBEP. When addressing this request, staff asks the applicant to please provide and consider the following in the response:

- a. Provide a list and supporting text of considerations utilized in the alternatives site search (mandatory parcel size, transmission interconnection requirements, etc.).
- b. To the extent feasible, seek brownfield site(s) already served by transmission and other utility connections with capacity to serve such a facility. If no such site exists, clearly explain the methodology and data for determining such and discuss what necessary transmission interconnection right-of-way corridors would be required to serve the site, as well as any necessary substation improvements.
- c. To the extent feasible, seek site(s) with existing zoning and general plan land use designations allowing for development of a power plant. If no such site exists, clearly explain the methodology and data for determining such. Should the site not allow for such a development, discuss the feasibility of attaining zoning and general plan land use amendments at the alternative site(s) to allow for power plant development.
- d. Discuss existing land ownership and constraints/feasibility to acquire or lease the site(s).
- e. Identify existing and surrounding land uses of the site(s).
- f. Provide an analysis of opportunity and constraints regarding how this potential site could serve centers of electrical demand within the CAISO Western Los Angeles Basin Local Reliability Sub-Area for maximum efficiency and system benefit.
- g. Provide a comparison of the environmental impacts of construction and operation of the project at the alternative site(s) versus at the proposed site (RBGS).

BACKGROUND

The Energy Commission has received a number of public and governmental agency comments requesting the PSA analyze decommissioning and future non-industrial reuse of the RBGS as part of the No Project Alternative scenarios.

Additional information is needed by staff to adequately consider and analyze a No Project Alternative decommissioning scenario.

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DATA REQUESTS

49. Please provide the following information regarding a No Project Alternative that entails decommissioning of the RBGS facility, remediation of the site for public use, and land acquisition by either the city of Redondo Beach or a private developer for non-industrial use:
- a. Provide an itemized list and map showing what facilities would be removed and area(s) remediated under decommissioning of RBGS.
 - b. Provide an itemized list and map showing what existing and planned facilities would not be removed and area(s) not included as part of decommissioning of RBGS.
 - c. Provide a conceptual scope of work and schedule for demolition and site remediation (i.e., for purposes of potential future development of the site with non-industrial land uses) of the RBGS and any related transmission and other RBGS-related utility interconnections that could be removed under decommissioning.

BACKGROUND

Section 6.4 of the AFC discusses No Project Alternative scenarios, which included a cursory level analysis of several retrofit options at the existing RBGS to comply with the State Water Resources Control Board (SWRCB) once-through cooling (OTC) policy. Additional information is needed by staff to adequately consider and analyze these No Project Alternative retrofit scenarios.

DATA REQUESTS

50. Please provide the following information regarding a No Project Alternative that entails retrofitting the RBGS facility to comply with the SWRCB OTC policy:
- a. For a closed-loop cooling system, please provide a location and height of the necessary cooling towers (wet cooling system) and/or air-cooled condenser (dry cooling system). Please describe all necessary improvements and infrastructure needed for retrofitting the RBGS to a closed-loop system, as well as cooling design parameters (such as heat rejection capacity, number of cells, and water recirculation rate).
 - b. AFC Section 6.4 states that Title 22 Reclaimed water is limited in the South Bay area. Provide in detail and substantiate why reclaimed water in the South Bay area is not available in sufficient quantities to serve the RBGS under a wet- or dry-cooled retrofit utilizing such a water source. Please provide details regarding the nearest available reclaimed water source able to adequately support a wet- or dry-cooled retrofit for the long-term and discuss what necessary infrastructure (pipeline, pipeline route, treatment facility, etc.) would be needed to provide reclaimed water to the site in quantities sufficient to serve either a wet- or dry-cooled retrofit scenario utilizing a reclaimed water source. Also, provide an

estimate as to the daily amount of non-potable water used under these retrofit scenarios.

- c. Please provide details regarding the infrastructure upgrades (new pipeline, etc.) that would be needed to utilize potable water in quantities sufficient to serve either wet- or dry-cooled retrofit scenarios. Also, provide an estimate as to the daily amount of potable water used under these retrofit scenarios.
- d. Please describe all necessary improvements and infrastructure needed for retrofitting the RBGS to utilize an air-cooled condenser, describing changes to on-site component height and massing. Provide details (including a site map, layout, etc.) and substantiate any RBGS site size constraints for this retrofit scenario.

BACKGROUND

Based on preliminary staff analysis of the RBEP, staff will be considering a Reconfigured Site Alternative to potentially lessen or avoid environmental impacts (at this time, focused on reducing potentially significant RBEP visual and/or noise impacts). Staff acknowledges that within the West Basin Municipal Water District (WBMWD) Ocean Water Desalination Program Master Plan (PMP) Project Entitlements Acquisition Plan (PEAP), dated January 2013, WBMWD proposes ocean water desalination facilities at either the NRG El Segundo Generating Station (ESGS) property or AES RBGS property. Staff also acknowledges that at this time, WBMWD has stated siting a proposed 30 or 60 MGD ocean water desalination facility at the RBGS is their preferred location.

Given the potential for use of the RBGS site for other projects, additional information is needed by staff to adequately consider and analyze the feasibility of a Reconfigured Site Alternative.

DATA REQUESTS

51. Please provide the following information regarding a Reconfigured Site Alternative:
 - a. Provide an itemized list and map explaining/showing site constraints including, but not limited to: existing site restrictions, necessary RBEP infrastructure and components, possible locations of the WBMWD desalination facility, and other site constraints.
 - b. Provide an alternative site layout directed toward lessening potential visual changes/impacts of the RBEP from key public observation points, including but not limited to, residential and recreational locations surrounding the facility. Describe and substantiate any feasibility issues of this alternative site configuration.
 - c. Provide an alternative site layout directed toward lessening potential noise changes/impacts of the RBEP to adjacent sensitive receptors including residential and recreational locations surrounding the facility. Describe and substantiate any feasibility issues of this alternative site configuration.

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Technical Area: Cultural Resources
Authors: Melissa Mourkas, M.A., ASLA, and Gabriel Roark, M.A.

BACKGROUND

The Redondo Beach Energy Project (RBEP) application for certification (AFC) states that temporary roads, laydown areas, work areas, and construction parking areas would be covered with rock aggregate (AES 2012a:2-36). The AFC does not appear to identify the source(s) of rock aggregate or whether fill dirt from off-site sources would be required for construction. Procurement of construction materials, such as rock and soil, from off-site sources has the potential to cause a variety of environmental impacts. For example, if soil or rock were removed from a previously unidentified, off-site archaeological resource, damage to the resource would result. Such ground disturbance could also disturb human remains or sensitive plant communities.

DATA REQUEST

52. What is the applicant's proposed source(s) for obtaining rock aggregate for construction? If the exact facility/vendor is not currently known, indicate whether the rock aggregate would be purchased from a commercial facility or obtained through other means.

BACKGROUND

The AFC states that construction-related excavations are expected to reach depths of up to 10 feet below ground surface, except for foundation pilings, which would be driven about 40 feet or more below the current ground surface (AES 2012a:5.3-2). Staff believes, however, that some proposed project components could require excavation to greater depths than those given in the AFC. Namely, excavation of the transmission tower foundations might entail excavation in excess of 10 feet below ground surface, as could the demolition of some existing utilities and installation of new utilities. It is unclear whether the proposed transmission tower foundations and utilities fit the profile that the AFC gives for excavation depths of 10 and 40 feet, respectively. This information is critical for staff to assess potential impacts on cultural and paleontological resources.

DATA REQUEST

53. Confirm that the proposed transmission tower foundations and demolished and new utilities would be confined to depths of either up to 10 feet or up to 40 feet below ground surface. Provide more specific excavation depths for these proposed facilities if such information is available at this time.

BACKGROUND

The AFC states that the "majority of the existing storm drains onsite will remain in place" (AES 2012a:2-15). Staff has examined the preliminary grading and drainage plans in Appendix 5.15a to the AFC and cannot discern which storm drains would be removed and which would be left in place. Staff needs this information to determine the extent of excavation needed to implement the proposed project.

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DATA REQUEST

54. Please provide a figure depicting the locations of storm drains that would be slated for removal, at a scale similar to the plans in Appendix 5.15a to the AFC. Also identify the depth of excavation required to remove the storm drains.

BACKGROUND

The cultural resources section of the AFC and the cultural resources inventory report contain information backed by in-text citations that lack corresponding bibliographic entries in the References Cited or Consulted section of both documents (AES 2012a:5.3-41-46; Cardenas et al. 2012:6-1-6). Without this bibliographic information, staff, parties, and the public have no way to verify the accuracy of certain statements made in the AFC and cultural resources inventory report. In turn, this hinders efforts to assess the potential impacts of the RBEP on cultural resources. The table immediately below identifies the missing citations, which document is missing the citations, and on which page(s) the citations occur in the respective documents.

Missing Citation	Document and Page Number	Notes/Comments
King 1967	Cardenas et al. 2012:2-2	Section 6 of the report contains a reference to King 1971, which is cited in the corresponding AFC discussion (AES 2012a:5.3-11).
Missing citation	Cardenas et al. 2012:2-2	The fourth full paragraph on this page contains an opening parenthesis, with no citation within or closing parenthesis, sentence ending, "...have been in operation (." Corresponding discussion in the AFC does not give indication of a missing citation, ending the sentence at "operation" (AES 2012a:5.3-11).
ERHA n.d.	AES 2012a:5.3-17; Cardenas et al. 2012:2-8	None.
Fuller 1940	Cardenas et al. 2012:4-4	Cardenas et al. 2012:6-2 appears to have mixed bibliographic information for Friedrichs 1987 and Fuller 1940. AES (2012a:5.3-43) clearly separates the two.
NPS 2008	AES 2012a:5.3-8	None.
NPS 1983	AES 2012a:5.3-29	None.

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In addition, Tables 1 and 5.3-1 in the cultural resources report and AFC (respectively) present the author, year, and South Central Coastal Information Center (SCCIC)¹ report number for previous cultural resource studies in the applicant's records search area. A note in the tables refers the reader to Appendix 5.3C for the bibliographic data associated with each of the tabulated reports rather than reproducing this information in the References Cited and Consulted sections of the AFC and cultural resources report. Staff finds this situation problematic. Appendix 5.3C is a confidential submittal and cannot be released to the public without individuals or organizations petitioning the Energy Commission's Dockets Unit to review the appendix. Therefore, the public and other parties are unable to determine what types of studies were conducted in records search area.

DATA REQUESTS

55. Clarify whether King (1967), cited in Cardenas et al. (2012:2-2), should have been cited as King (1971).
56. Provide the citation missing from Cardenas et al. (2012:2-2), or confirm that a citation is unnecessary, as in the corresponding discussion in the AFC (AES 2012a:5.3-11).
57. Provide bibliographic information for ERHA (n.d.) and NPS (1983, 2008).
58. Confirm whether the AFC is correct in separating the Fuller (1940) and Friedrichs (1987) bibliographic information.
59. Provide full bibliographic information for the reports cited in AES (2012a: Table 5.3-1) and Cardenas et al. (2012: Table 1). Follow the references cited format of the Society for American Archaeology's most recent Style Guide, including disclosure of the entity responsible for report preparation and the entity for which the reports were prepared. Do not simply provide the bibliographic list generated by the SCCIC, as the list does not contain all of the information of interest to staff and other parties.

BACKGROUND

As required by Title 20, California Code of Regulations §1704(b)(2) and Appendix B thereto (CEC 2007:24, 86), the applicant provided copies of all cultural resources reports that document survey coverage within the project area or within 0.25 mile of it. Pursuant to the same regulation, the applicant also provided the Energy Commission with copies of reports pertaining to archaeological excavations in the records search area. (AES 2012b) During the course of staff's review of the AFC, staff observed that the copy of Demcak (1990) is missing every other page, beginning with page 1². Demcak (1990) reports on archaeological findings at the site of Engva, a documented

¹ The SCCIC is part of the California Historical Resources Information System, the State of California's official repository for known cultural resources and previous cultural resource studies. The SCCIC contains these records as pertains to the counties of Los Angeles, Orange, and Ventura.

² Staff did not catch this missing information during data adequacy review because all but one page of Demcak (1990)—as reproduced in AES (2012b)—is not paginated.

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ethnographic occupation site and/or salt-gathering locality (see Kroeber 1976: Plate 57). Some of Demcak's (1990) findings are not available to staff because the copy provided has pages missing. Information on Engva has direct bearing on staff's assessment of RBEP's potential impacts on cultural resources.

DATA REQUEST

60. Please provide the missing pages from Demcak (1990) or a complete copy of the report.

BACKGROUND

The applicant's account of obtaining recent records search data for the proposed project is internally inconsistent. The AFC and cultural resources report state that CH2M Hill requested a records search from the SCCIC on August 30, 2011 (AES 2012a:5.3-24; Cardenas et al. 2012:3-1). Appendix 5.3C contains a records search results letter from the SCCIC dated September 1, 2011 (AES 2012b; Galaz 2011). Appendix 5.3C to the AFC, however, contains a records search request letter dated May 14, 2012 (AES 2012b; Cardenas 2012). It is unclear if the 2012 request yielded information not included in the 2011 records search or in the AFC.

DATA REQUEST

61. Did the applicant request two separate records searches, one in 2011 and one in 2012? If so, did the 2012 records search yield information not included in the 2011 records search or in the AFC? If so, please provide copies of the site records and reports, consistent with the requirements of Appendix B to Title 20, California Code of Regulations §1704(b)(2).

BACKGROUND

The California Environmental Quality Act (CEQA) and State CEQA Guidelines direct lead agencies to identify historical resources and unique archaeological resources that may be affected by proposed projects, and assess their impacts on those resources (Pub. Resources Code, §21083.2[a]; 14 Cal. Code Regs., §15064.5[b] and [c]). Lead agencies (in this case, the Energy Commission) "shall determine whether a significant effect on the environment based on substantial evidence in light of the whole record" (Pub. Resources Code, §21082.2), as defined at Title 14, California Code of Regulations, section 15384. CEQA practice recognizes the value of incorporating historic records in efforts to identify historical and unique archaeological resources (Governor's Office of Planning and Research 1999:360).

The AFC and cultural resource report list the historic maps and aerial photographs examined by the applicant's environmental consultant; staff located additional historic maps and aerials among the records search material and appendices to the AFC (AES 2012a:5.3-25, Figure 5.3-2; AES 2012b:4-2; EMS 2012; Lee 1990:Figure 6). An attempt was made in the AFC and cultural resources report to provide the requisite level of information needed by staff to evaluate project impacts on historical and unique archaeological resources. The presentation of the applicant's review of historic maps

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and aerial photographs, however, is only adequate for staff's analysis up to the 1890s—the AFC and supporting documents contain no historic maps dating to earlier phases of human occupation of the project vicinity (that is, A.D. 1769–1880s). The purpose of such research in a cultural resources impact analysis is to obtain a visual understanding of the natural and cultural development of the land in and around the project area of analysis (PAA), identify locations of potential historic built environment and archaeological resources, and have a partial, chronological record of disturbances in the PAA. To this the applicant should attempt to locate detailed maps of the PAA at 10-year intervals³, beginning about A.D. 1769 and, in the present case, terminating with the 1880s. Indeed, given the AFC's disclosure that the Spanish once used the proposed project site to gather salt from Old Salt Lake, it seems to staff that the lack of pre-1890s historic maps is a considerable neglect of important source documents about the entire Spanish and Mexican periods and about a third of the American period in the project vicinity. The age of building and structural remnants on historic archaeological resources inform on the likelihood of encountering refuse pits or artifact-filled privy pits (outhouse pits). Features such as refuse and privy pits frequently contain sufficient archaeological information to qualify archaeological resources for listing on the California Register of Historical Resources. The number and range of archaeological and historic built environment resources is likely to be underrepresented in cultural resource studies that do not include a comprehensive review of available historic maps. In turn, the quality of cultural resources impact assessments may suffer.

Additionally, neither the cultural resources section of the AFC nor confidential cultural resources report cites the aerial photographs that the applicant examined, except to state that the photographs were found in the Huntington Digital Library (AES 2012a:5.3-24; Cardenas et al. 2012:3-1). This leaves staff, parties, and the public unable to discern the span of years covered by the aerial photographs, let alone interpret the photographs for themselves. Whereas staff, parties, and the public theoretically could consult the Huntington Digital Library to examine the aerial photographs, online archives and libraries are subject to change, which hinders one's ability to understand the basis for the applicant's analyses and conclusions.

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62. Please review historic maps of the proposed project area that date between 1769 and the 1880s. Include survey and rancho plats drafted by the General Land Office, as well as Spanish diseños. Provide documentation of any evidence of historic features in the project area and copies of those portions of historic maps that cover the proposed project area.

³ Five- to 10-year intervals are widely regarded as a reasonable basis on which to observe mapped changes in landscapes and settlement patterns in historical research (Conzen 1990:189).

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63. Please provide bibliographic information for the aerial photographs referenced in the cultural resources section of the AFC and the confidential cultural resources report (see AES 2012a:5.3-24; Cardenas et al. 2012:3-1). Include the following information:

- Author
- Date of publication
- Title of photograph
- Scale of photograph
- Date of flight
- Publisher and place of publication
- Specific URL for the photograph

BACKGROUND

Historical Landscape and Site Design Elements

In the early to mid-20th Century, it was not unusual for power plants and municipal services facilities to be set into landscaped grounds. The Redondo Beach Generating Station is an example of that trend, with its manicured lawn and plantings in the publicly visible areas of the plant site, specifically along Harbor Drive and the entrance area to the Administration Building. A number of landscape elements were included with the 1948 site plan and can be seen in historical photographs. These included the raised pedestal of lawn along the sidewalk fronting Harbor Drive and in front of the Administration Building, as well as foundation shrubs planted along both of these facades. The original foundation plantings along the Harbor Drive elevation appear to be mostly replaced with more recent plantings, while those at the front of the Administration Building may be original to the site.

The specimen tree in front and to the east of the entryway of the AES Administration Building at Redondo Beach appears to be a Moreton Bay Fig Tree, *Ficus macrophylla*. It is native to Australia and planted in Southern California, Florida, and Hawaii in the United States. It is an uncommon tree and it is rather surprising to find it on the site of a power plant. There are five of these trees on the AES Redondo Beach property. The large leaves (macrophylla) and distinctive fruit (figs) are characteristic of the tree, as are the large above-ground root system and broad growth habit. There is a grove of four of these trees at the southeast end of the property, south of where Fuel Oil Tank 4 once stood. The tree in front of the Administration Building has been nicely pruned and maintained, receiving regular water, while the grove of four trees at the southeastern end of the property appear to have been left to develop their own habits. They have striking above-ground roots and have multiple trunks. They appear healthy even with little maintenance or regular watering.

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Some communities have given Moreton Bay Fig trees landmark or heritage tree status. Some notable heritage Moreton Bay Fig Trees are at the following locations in Southern California:

- Monrovia Public Library, Monrovia
- Old Man Tree, Oceanside
- Rancho Los Alamitos, Long Beach⁴

Historical photographs from the Huntington Digital Library Edison Collection⁵ indicate that the tree at the Administration building post-dates 1955. *Google Earth* historical imagery shows all the fig trees at mature sizes as early as 1994. *Historicaerials.com* has a 1972 image which appears to show trees in the locations where they exist today. An image from 1953 has a faint indication of the grove of four trees. This is prior to installation of Fuel Oil Tank 4. Therefore, it is possible to extrapolate that the grove of four trees were planted or appeared as volunteers in the early 1950s. Staff has been unable to determine an approximate date for the tree in front of the Administration Building using these sources.

The extant palm trees aligned with the sidewalk on Harbor Drive post-date the 1955 photograph. Shadows cast by palm trees (*Washingtonia robusta*) in front of Units 7 & 8 appear in a 1980 aerial from *historicaerials.com*, but they do not at this time appear along the entire Harbor Drive frontage. Google Earth historical imagery from 1994 shows the palm trees in their current locations along Harbor Drive. In addition, there is an existing group of three palm trees in the foundation plantings of Plant 1 but they are difficult to see in historical aerial imagery. They appear to be of mature size and height, much like the palm trees along the road.

DATA REQUESTS

In order to better understand the landscape elements of the site, its design and evolution over time and how such site elements relate to the period of significance for the historic-age power plant, staff requires the following information.

64. Confirm and report the genus, species and age of the five fig trees extant on the AES Redondo Beach property in consultation with a Registered Consulting Arborist (American Society of Consulting Arborists), or, after consultation with Energy Commission Cultural and Biological Resources staff, another qualified tree professional, such as a botanist or biologist familiar with non-native tree species.

⁴ <http://www.rancholosalamitos.com/index.html>

⁵ Huntington Digital Library: Southern California Edison Photographs and Negatives.

<http://hdl.huntington.org/cdm/landingpage/collection/p16003coll2>

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65. Confirm and report the genus, species and age of the extant palm trees on the AES Redondo Beach property frontage along Harbor Drive in consultation with a Registered Consulting Arborist (American Society of Consulting Arborists), or, after consultation with Energy Commission Cultural and Biological Resources staff, another qualified tree professional, such as a botanist or biologist familiar with palm species.

66. Confirm and report the genus, species and age of the juniper shrubs extant on the AES Redondo Beach property in the foundation plantings of the front entry to the Administration Building (north elevation) in consultation with a Registered Consulting Arborist (American Society of Consulting Arborists), or, after consultation with Energy Commission Cultural and Biological Resources staff, another qualified tree professional, such as a botanist or biologist, familiar with non-native tree and shrub species.

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REFERENCES

- AES 2012a—AES Southland.** *Application for Certification, Redondo Beach Energy Project*. Vol. 1. November. Submitted to California Energy Commission, Sacramento. 12-AFC-03. Docket Unit TN # 68597.
- AES 2012b—AES Southland.** Results of the Literature Search – Confidential. Appendix 5.3C in AES Southland, *Application for Certification, Redondo Beach Energy Project*. Vol. 1. November. Submitted to California Energy Commission, Sacramento. 12-AFC-03. Docket Unit TN # 68619.
- Cardenas 2012—Gloriella Cardenas.** Letter Regarding Redondo Beach Generating Station Project Sites Literature Search. May 14. CH2M Hill, Santa Ana, CA. Submitted to CHRIS South Central Coastal Information Center, Fullerton, CA. In AES Southland, Results of the Literature Search – Confidential, Appendix 5.3C to *Application for Certification, Redondo Beach Energy Project*. November. Submitted to California Energy Commission, Sacramento. 12-AFC-03. Docket Unit TN # 68619.
- Cardenas et al. 2012—Gloriella Cardenas, Lori Durio Price, Natalie Lawson, and Clint Helton.** *Confidential Cultural Resources Inventory Report for the Redondo Beach Energy Project, Los Angeles County, California*. May. CH2M Hill, Santa Ana, CA. Prepared for AES-Southland Development, Redondo Beach, CA. Submitted to California Energy Commission, Sacramento. 12-AFC-03. Docket Unit TN # 68619.
- CEC 2007—California Energy Commission.** *Rules of Practice and Procedure & Power Plant Site Certification Regulations*. April. Sacramento, CA. CEC-140-2007-003.
- Conzen 1990—Michael P. Conzen.** North American County Maps and Atlases. Chapter 8 in *From Sea Charts to Satellite Images: Interpreting North American History through Maps*, edited by David Buisseret, pp. 186–211. Chicago: The University of Chicago.
- Demcak 1990—Carol R. Demcak.** *Archaeological Assessment of the Property Located at 811 North Catalina Avenue, Redondo Beach, County of Los Angeles, California*. August. Archaeological Resource Management Corporation, Fullerton, CA. Prepared for DJM Company, Torrance, CA. On file, South Central Coastal Information Center, California Historical Resources Information System, Fullerton, CA. Study L-2189.
- EMS 2012—Environmental Management Strategies.** *Technical Report: Phase I Environmental Site Assessment, Redondo Beach Electrical Power Plant, 1100 North Harbor Drive, Redondo Beach, CA*. February. Irvine, CA. Prepared for AES North America Development, Long Beach, CA. Appendix 5.14A in AES, *Application for Certification, Redondo Beach Energy Project*. Vol. 2. November. Submitted to California Energy Commission, Sacramento. 12-AFC-03. Docket Unit TN # 68597.

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