

DOCKETED

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Project Title:	El Segundo Power Redevelopment Project Compliance
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Document Title:	Cultural Resources Memo
Description:	Data Request 78 is Incomplete
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Memorandum

To: Christine Stora, Compliance Project Manager

Date : May 12, 2014

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From : **Gabriel Roark**
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Subject: El Segundo Energy Center Amendment, Dry-Cooling Amendment (00-AFC-14C), Project Owner's Response to Data Request 78 is Incomplete

I reviewed the project owner's May 7, 2014 records search submittal (ESEC 2014), which was intended to fill the remaining data gaps identified in staff Data Request 78, filed in August 2013 (CEC 2013:25). More specifically, the May 7 submittal addressed information that staff identified as missing from the project owner-supplied records search on April 23, 2014 (CEC 2014). In staff's memorandum, staff requested of the project owner copies of four (staff mistakenly stated five in the memo) sets of records on previously recorded cultural resources and over 20 previous cultural resources studies within or suspected to be within the records search area for the proposed project.

The May 7 records search submittal provides the majority of the requested documentation. For some studies, the project owner indicates that pages missing from the studies are absent (having been misplaced) from the information center's files, and so are not recoverable. The project owner did not provide a copy of study LA-11031, since it was conducted more than a mile from the project site. Staff understands that these particular data gaps are beyond the project owner's control and accepts that the data are not available. Similarly, staff agrees with the project owner that previous studies conducted more than a mile from the project area of analysis do not need to be obtained and copied (such as study LA-11031).

Staff notes, however, that the project owner's May 7 submittal still leaves considerable data gaps. These are described in the bulleted list below.

- Study LA-8255/OR-3373: The project owner inadvertently provided staff with a complete copy of study OR-3733, which is a different report and located far from the project area of analysis. Please provide a copy of OR-3373.
- Study LA-11561: Page 6 appears to be missing. Please confirm and supply the page, if missing.

- Study LA-01982: Pages 5-3, 5-5–5-7, and 5-11 appear to be missing. Please confirm and supply the pages, if missing.
- Study LA-04910: Appendices D and F both contain 11-by-17-inch or legal-sized maps that have been copied while folded to 8.5-by-11-inch sheets, obscuring most of the maps' detail. Please confirm whether these were miscopied during the project owner's records searches or the maps in questions were copied this way in the information center's files.

The project owner's records search is otherwise complete. Nevertheless, staff requires resolution of the issues identified above in order to complete the final staff assessment.

REFERENCES CITED

CEC 2013—California Energy Commission. Letter Regarding El Segundo Energy Center Amendment, (00-AFC-14C) Data Request Set 1 (Nos. 1 - 83). August 12. Sacramento, CA. Submitted to NRG Energy, Carlsbad, CA. Docket Unit, California Energy Commission, Sacramento. TN 200155.

CEC 2014—California Energy Commission. Memorandum Regarding El Segundo Energy Center, El Segundo Power Facility Modification (00-AFC-14C): Project Owner's March 28, 2014 Response to Data Request 78. April 23. Sacramento, CA. On file, Dockets Unit, California Energy Commission, Sacramento. TN 202213.

ESEC 2014—El Segundo Energy Center, with CH2M Hill. *El Segundo Energy Center Petition to Amend (00-AFC-14C), Cultural Resources Data Response (Supplemental Response to CEC Data Request 78)*. May 7. Carlsbad, CA, and Sacramento, CA. Submitted to California Energy Commission. 00-AFC-14C. TN 202318-a, 202318-2.