

DOCKETED

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500 Capitol Mall, Suite 1800
Sacramento, CA 95814
Telephone: 916-930-2500
Fax: 916-930-2501
www.lockelord.com

John A. McKinsey
Direct Telephone: 916-930-2527
Direct Fax: 916-720-0443
jmckinsey@lockelord.com

December 3, 2013

VIA E-FILING

El Segundo Energy Center Petition to Amend (00-AFC-14C)
Craig Hoffman, Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: El Segundo Energy Center Petition to Amend (00-AFC-14C)
Cultural Resources Data to Supplement Responses to Data Request Set 1

Dear Mr. Hoffman:

In response to California Energy Commission staff ("**Staff**") requests for certain supplemental information about cultural resources, El Segundo Energy Center LLC ("**ESEC LLC**") hereby submits the enclosed data to supplement its responses to Staff's Data Request Set 1. Although the information ESEC LLC provided to Staff pursuant to ESEC LLC's September 12, 2013 Application for Confidential Designation of Cultural Resources for Data Requests 68 through 82 remains confidential, the enclosed information is not confidential. Please contact me or my colleague Allison Harris if there are questions about the enclosed data.

Locke Lord LLP

A handwritten signature in blue ink that reads "John A. McKinsey".

By: _____
John A. McKinsey
Attorneys for El Segundo Energy Center LLC

JAM:awph

Enclosure

El Segundo Energy Center Petition to Amend

(00-AFC-14C)

Cultural Resources Data Response

(Response to CEC Request for Supplemental Data
Dated October 1, 2013)

Submitted to
California Energy Commission

Prepared by
El Segundo Energy Center LLC

With Assistance from

CH2MHILL®

2485 Natomas Park Drive
Suite 600
Sacramento, CA 95833

December 3, 2013

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Introduction

Attached is El Segundo Energy Center LLC's (ESEC LLC) response to Cultural Resources data requested by California Energy Commission Staff (Staff) at the October 1, 2013 Workshop for the El Segundo Energy Center (ESEC) Petition to Amend (00-AFC-14C).

Cultural Resources Data Response

I. Responses to Staff's Workshop Requests

On October 1, 2013, California Energy Commission (CEC) staff held a workshop to clarify Staff's data requests and ESEC LLC's data responses. At that workshop, Staff requested supplemental data for several of ESEC LLC's data responses. The following information addresses Staff requests concerning Cultural Resources.

DATA REQUEST

CR-A. Excavation and Fill Depth: Staff requested supplemental data regarding excavation and fill depth and other engineering details such as the locations of cultural resources on the project site, and whether native sediments will be intersected with fill. Staff also requested a figure showing the depth of previous and proposed ground disturbance.

Response: As requested, ESEC LLC has prepared Figure CR-1, which reflects the results of several important data sets that establish the project property as highly disturbed from decades of development, both aerially and vertically. This figure depicts the depths of historical ground disturbance at the project site from the 1950s to the present time; including the removal of former Units 1 and 2 and construction of Units 5 through 8, and the anticipated depths of disturbance for the proposed removal of Units 3 and 4 and construction of Units 9 through 12. As indicated on Figure CR-1, the vast majority of proposed, construction-related, ground disturbance will occur within previously disturbed soils and mechanical fill. Therefore, the potential for encountering unknown, intact, subsurface archaeological material within the planned areas of excavation is extremely low, and the potential for finding historical resources that qualify for the California Register of Historical Resources is even lower.

No cultural resources were recorded at the project site (See *El Segundo Power Redevelopment Project, Cultural Resources*, Wesson et al., 2000; *Sensitivity Analysis of Water and Sewer Lines Associated with the El Segundo Generating Station Project, El Segundo, Los Angeles County, California*, Mikesell, 2000; and *Supplemental Historic Research on the Kramer Staging Area*, Bunse, 2000). In addition, no significant cultural resources were observed in 34 months of cultural resources monitoring during the construction of the initial ESEC Project (00-AFC-14) from October 2010 to July 2013. (JMA is currently preparing the final Cultural Resources Report required by California Energy Commission Condition of Certification CUL-4 for Units 5 through 8; therefore, this response is based on data gathered from monthly compliance reports.) JMA observed various isolates, all historical material found in previously disturbed contexts, including brick and fragmented brick, soda pop bottles, and both modern and historic debris. JMA recorded these observations in monthly cultural resources reports reviewed with CEC staff. Typically, isolates are not considered culturally significant and, therefore, not eligible for inclusion into the California Register of Historical Resources.

Based on the available ground disturbance data for the ESEC site, the ground in the modified project area is generally highly disturbed. For this reason, and because only isolated construction debris and bottles were unearthed during the recent construction of Units 5 through 8, new construction on the modified project has a low potential for impacting undisturbed soils or encountering any sensitive cultural resources.

The following source data were used to prepare Figure CR-1:

- Civil ESPFM Grading Plan Sheet 2 Figure 2-3C
- Civil ESPFM Grading Plan Profiles and Sections Figure 2-3D

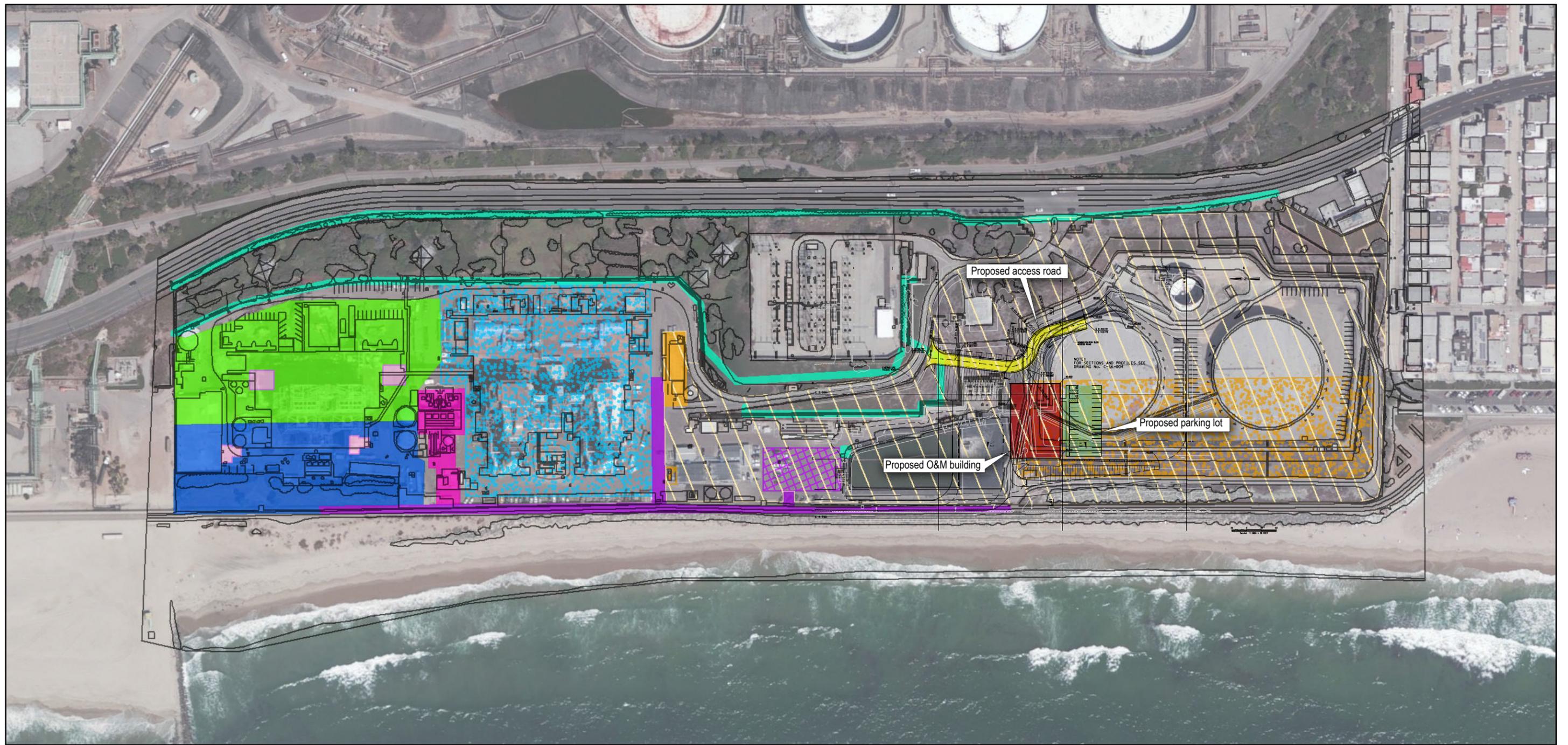
- Demolition Specification NRG ESGS Relocation for Re-Power: Specification for Below Grade Demolition Units 1&2 Drawings:
 - 6134-C-822010
 - 6134-C-822020
 - 6134-C-822021
- Southern California Edison (SCE) Auxiliary Bay Equipment Foundations Sheets Nos.1 and 4 (Units 3&4);
- SCE Fuel Oil Tank Site Sections and Details
- First Year Annual Report, El Segundo Shoreline Monitoring Program, Prepared by Nobel Consultants, Inc. April 2012
- Updated Phase I Environmental Site Assessment of El Segundo Energy Center Facility, 301 Vista Del Mar, El Segundo, California. Prepared by AECOM, May 2011

DATA REQUEST

CR-B. Cultural Resource Mapping: Staff requested that known cultural resources found at the site be placed on a 7.5 minute USGS quadrangle map.

Response:

As stated in ESEC LLC's Response to Data Request CR-A above, besides the isolated historic artifacts found during monitoring from 2010 to 2013, no other known cultural resources exist within the project site; therefore, a 7.5-minute USGS quadrangle map depicting known cultural resources has not been prepared.



LEGEND

Approximate Excavation Depths 1965 Development	Approximate Excavation Depths 2010-2013 Development	Proposed Excavation Depths
8' to 14.75'	2' to 3'	3.5' *
20' to 30'	4' to 10'	1.5' *
Engineered Fill Up to 21-feet deep	4' to 17'	Estimated at a minimum 15-feet *
Slope graded and recontoured	10' (Elev. 10.0')	
	10.1' (Elev. 9.9')	
	12' (Elev. 8.0')	
	17.9' to 21' (Elev. -1.0')	

Note:
 Approximate ground surface elevation on the northern half of the site is 20.0 feet above sea level. Groundwater elevation varies from 5 to 7 feet above sea level.

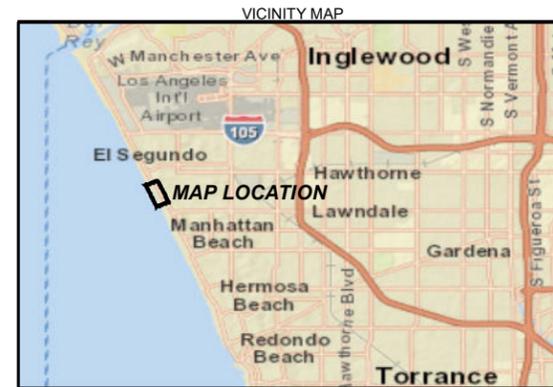
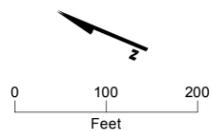


Figure CR-1
Proposed and Historical Depth of Excavation and Disturbance for Facilities and Support Systems
 El Segundo Power Facility Modification
 El Segundo, California