

QUAIL BRUSH GENCO, LLC  
9405 Arrowpoint Boulevard  
Charlotte, NC 28273

<b>DOCKET</b>	
<b>11-AFC-3</b>	
DATE	<u>NOV 07 2011</u>
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November 7, 2011

Mr. Eric Solorio  
Project Manager  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

RE: Quail Brush Generation Project Application for Certification

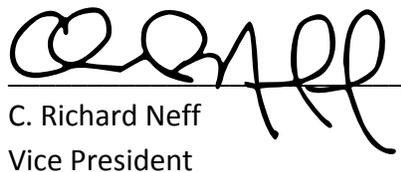
Dear Mr. Solorio:

Pursuant to the provisions of Title 20, California Code of regulations, Quail Brush Genco, LLC hereby submits the revised Supplemental Quail Brush Survey Design which is intended to provide a more detailed report assessing cultural resources in and around the project area.

As part of our Application for Certification, and based upon the enclosed survey design, we will be conducting and completing the additional work during the discovery phase of this case. We expect to complete the work and submit the final report within the next 90-days.

If you have any questions, please contact me at [RickNeff@Cogentrix.com](mailto:RickNeff@Cogentrix.com).

Regards,

  
C. Richard Neff  
Vice President

cc: Gary L. Palo  
Ella Foley Gannon, Esq.

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## REVISED ATTACHMENT C.2

### SUPPLEMENTAL QUAIL BRUSH SURVEY DESIGN

This supplemental survey is intended to account for the poor ground surface visibility experienced during the May 2011 cultural resources survey for the Quail Brush Generation Project (Project) in San Diego, California. Further, this supplemental survey is also intended to cover Project areas and agency-required buffers due to Project design changes that have occurred after the original May 2011 survey.

#### ***Background***

The original pedestrian survey consisted of walking 10- to 15-meter spaced transects in areas with slopes under 35 percent. That survey identified one previously recorded lithic deposit (CA-SDI-13576) and six newly identified isolates (QB-ISO-1 through QB-ISO-6) consisting of debitage, a core, historic-era vehicle bodies, and a possible historic survey marker. However, none are within the current Project layout or Area of Potential Effect (APE). The location of a second, previously recorded lithic scatter is within the APE, but was found during the original survey to have been destroyed (CA-SDI-13593) by grading activity. Ground surface visibility was considered poor over the majority of the APE due to dense grasses that were laid down over the ground.

The majority of the survey area is on privately owned land with small portions of two parcels owned by the City of San Diego and one owned by the County of San Diego. Therefore, landowner permission will be necessary to conduct the supplemental survey. Tetra Tech will work with the Applicant to notify landowners of the proposed work and obtain their permission for access to their land and any permits for City- and County-owned land. If permission is not granted by a landowner, survey work will not be conducted within that portion of the survey area.

#### ***Supplemental Survey Design and Protocols***

The supplemental survey will incorporate vegetation removal on a grid system in order to better view the surfaces where archaeological materials may exist. The survey will be constrained to slopes under 35 percent (19.3 degrees) within the APE and required California Energy Commission (CEC) buffers (see attached map), where access is granted by landowners. The CEC-required buffers include a 200-foot buffer on the preliminary switchyard and plant site project boundary and a 50-foot buffer on the access roads, gas lateral, gen tie line, and overhead line corridors. A slope limit is commonly used during archaeological survey as a health and safety precaution. Moreover, steep slopes in the San Diego area typically do not contain *in situ* cultural deposits and, in fact, the City of San Diego does not require pedestrian survey of slopes greater than 25 percent for this reason (personal communication, Myra Herrmann; City of San Diego 2001:57). Exceptions are made for areas such as rock outcrops within the APE or where structures may be visible from afar. In these cases, an effort is made to visually inspect the area. The tops of ridgelines and peaks of hills are understood to be of archaeological sensitivity, particularly for cairns, shrines, etc. Therefore, particular effort will be made to intensively inspect these areas as well. In order to confirm this archaeological site distribution patterning, wherein resources are rarely encountered on slopes greater than 35 percent, a random ten percent sample survey of such slopes will be incorporated into this supplemental survey using the protocols described below. These sample areas will be selected prior to fieldwork and the transects and grid points within them mapped in the field. Any areas within the random sample areas that are actually too steep to be safely traversed would be

excluded from the survey and depicted on the final survey area maps provided in the reporting described below.

In areas with less than a 35 percent slope as well as in the random sample survey areas greater than 35 percent slope, a 15-meter grid system will be laid out across the survey area and the vegetation will be removed within a one-meter-by-one-meter area centered on each grid point. The grid consists of 1,904 points within the 106-acre survey area. Of these, 371 are within areas with slopes greater than 35 percent. As noted above, a random ten percent sample (37 points) of these will be conducted. This would result in a total of 1,570 one-meter-by-one-meter points being cleared, or 0.39 percent of the survey area. Vegetation removal will avoid jurisdictional wetlands, sensitive plant species, and plants that host sensitive fauna species documented by the Project's biological resources survey (MBA 2011). This may require off-setting a grid point to avoid a single plant or avoiding an entire area completely (i.e. jurisdictional wetlands or dense stands of sensitive plants). Any offset points will be mapped in the field. The 15-meter grid spacing is based on the archaeological site distribution pattern, the average site size in the Project and surrounding areas, and the survey guidelines of the City of San Diego. The density of eroding medium to large cobbles from the underlying Stadium Conglomerate may make removal of vegetation using a shovel difficult. Therefore, a weed trimmer, if allowed by the Fire Department, or machete may be used to cut grasses to a length where the ground surface is readily visible rather than using a shovel to scrape the grasses away. Crews will be instructed to take great care with the weed trimmer, if used, to avoid hitting artifacts and potentially displacing them from the cleared area. The results of vegetation removal at each point will be systematically documented.

If cultural materials are identified, they will be mapped using a Trimble Global Positioning System unit and recorded on appropriate California Department of Parks and Recreation site forms. Vegetation removal shall be expanded around any identified archaeological resources or placed between grid points to the minimum extent necessary to determine the nature and extent of a found resource. No subsurface testing/screening or artifact collection will occur as part of this survey.

### ***Staffing***

The survey will be conducted by two crews of two professional archaeologists. Native Americans consulted as part of the original May 2011 survey will be contacted to determine if there is interest in participating in the survey. One paid Native American monitor will participate in the survey if interest is shown. Other interested Native Americans may participate in the survey on a voluntary basis.

### ***Supplemental Survey Documentation***

Results of the survey will be provided in a revised technical report that includes the results of the May 2011 survey and incorporates the results of this survey. This updated report will conform to the Archaeological Resource Management Report format (OHP 1990). The report will include maps of engineering design and surveyed areas and any additional recommended mitigation measures. The report will be provided to the CEC and the City of San Diego for comment and approval. If any resource identified by the survey cannot be avoided, it will be evaluated for California Register of Historical Resources eligibility and, if necessary to avoid significant impacts on the resource, additional treatments recommended. Methodologies and research designs for such actions, if necessary, will be submitted separately following the supplemental survey.

### **Schedule**

A draft revised technical report will be submitted for CEC and City of San Diego review and approval no later than 90 days after the CEC's published determination that the associated Application for Certification for the Project is data adequate. This is expected to occur on November 16, 2011. Therefore, fieldwork will likely occur in early December 2011 and a draft submitted on or before February 16, 2012.

### **References**

California Office of Historic Preservation (OHP)

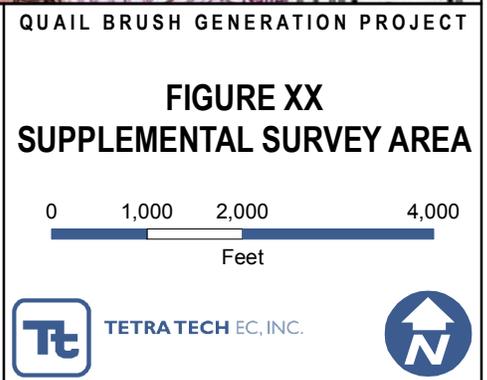
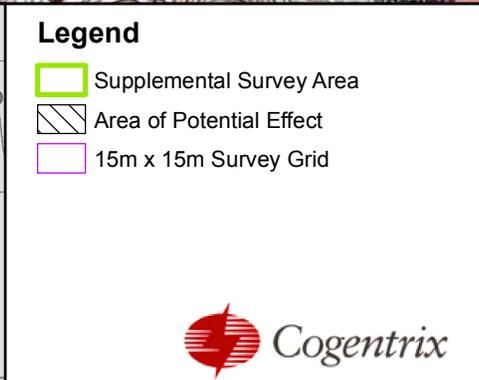
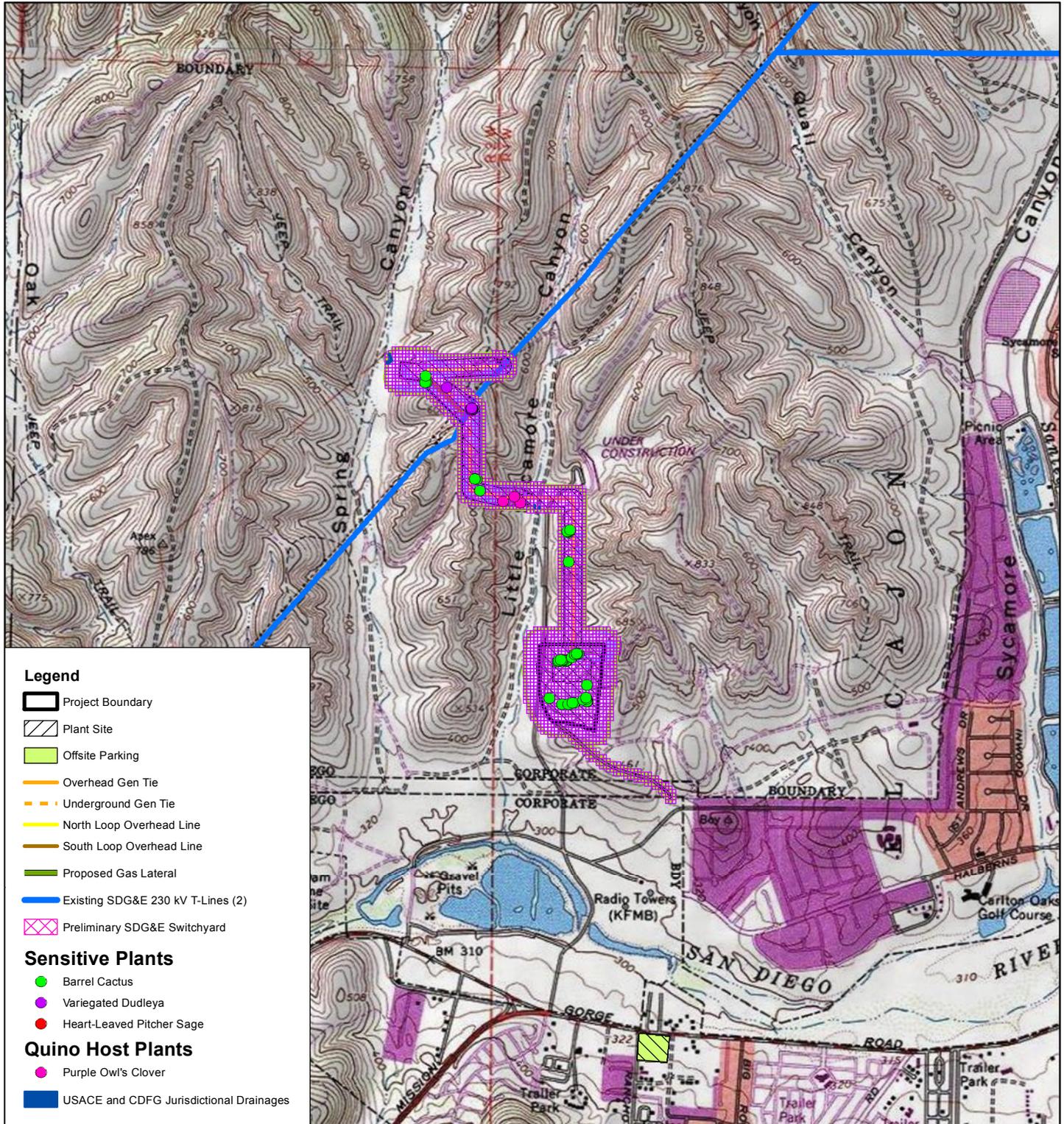
1990 *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format*. February 1990. Sacramento, California.

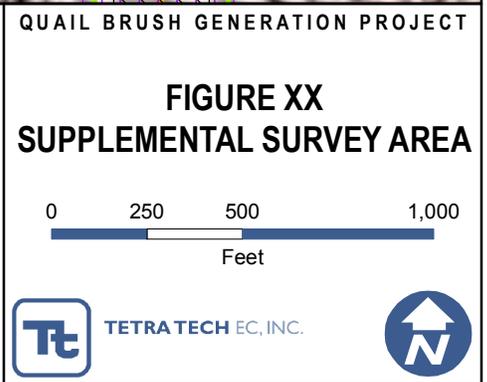
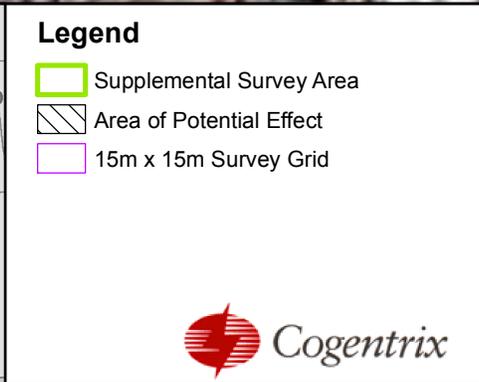
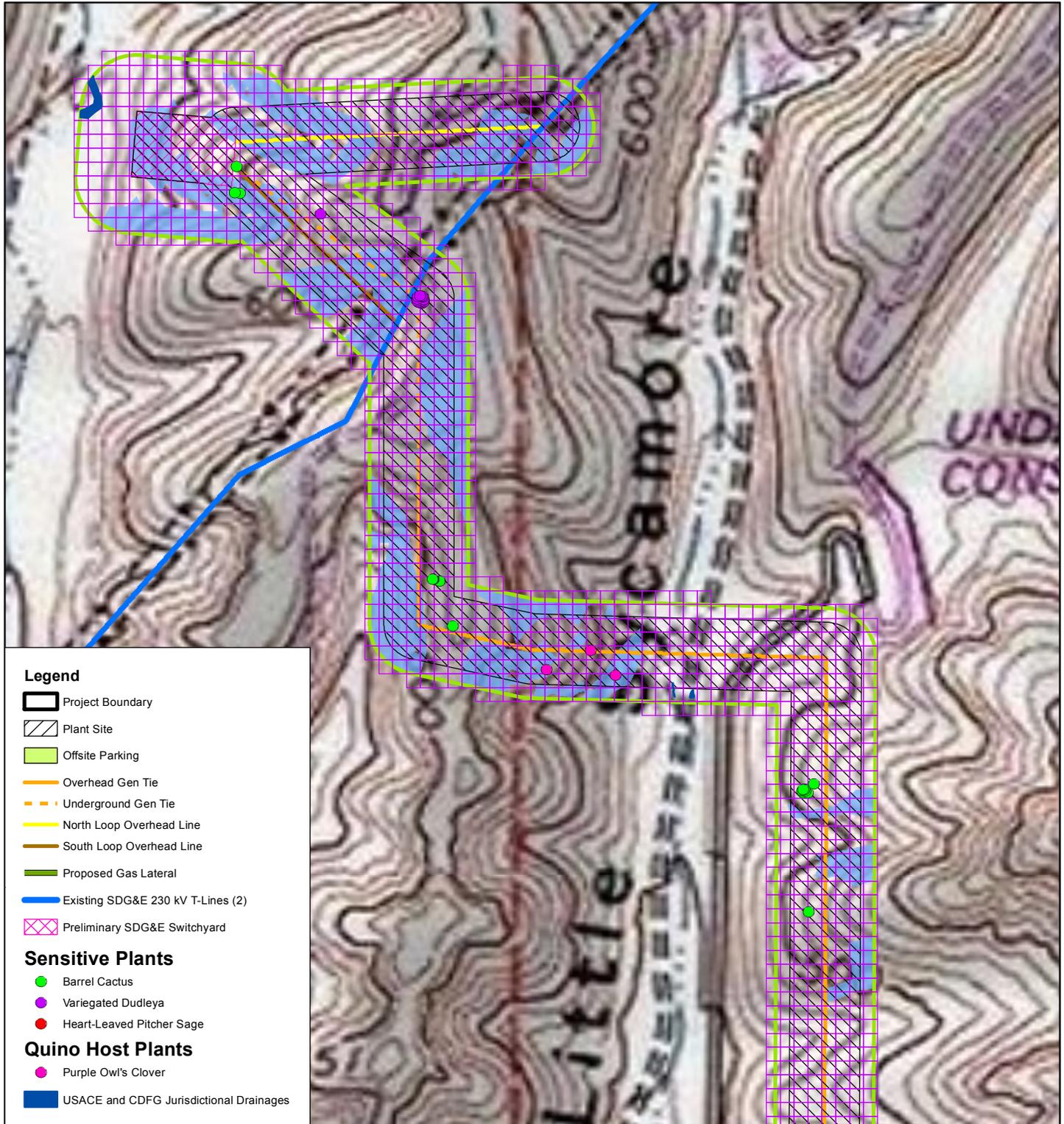
City of San Diego

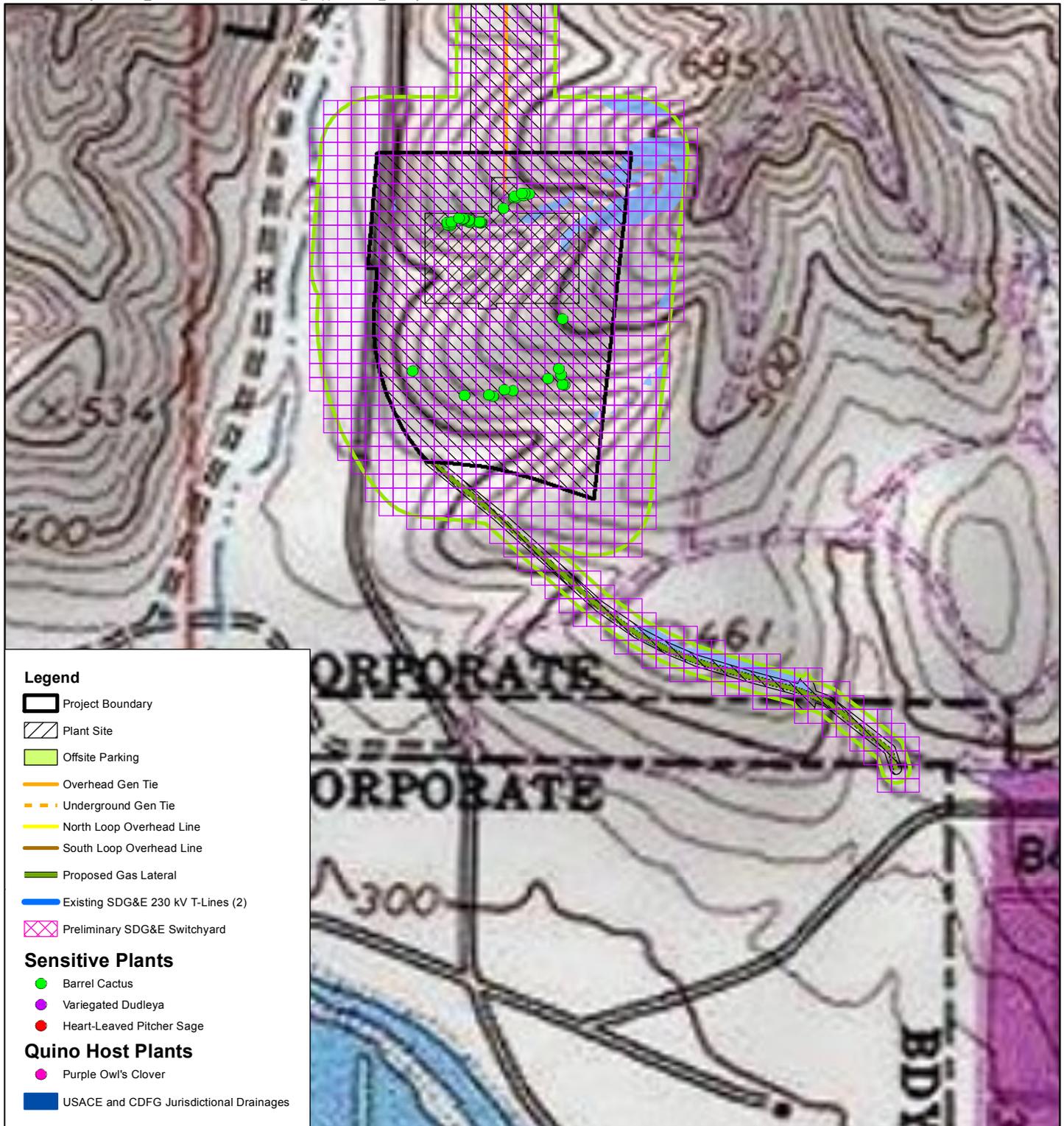
2001 San Diego Municipal Code – Land Development, Historical Resources Guidelines.

Michael Brandman Associates (MBA)

2011 *Focused Survey for Sensitive Plant Species Cogentrix Quail Brush Generation Project, City of San Diego, San Diego County, California*. Prepared for Tetra Tech EC, Inc., Lakewood, CO. Michael Brandman Associates, Irvine, CA.







**Legend**

- Project Boundary
- Plant Site
- Offsite Parking
- Overhead Gen Tie
- Underground Gen Tie
- North Loop Overhead Line
- South Loop Overhead Line
- Proposed Gas Lateral
- Existing SDG&E 230 kV T-Lines (2)
- Preliminary SDG&E Switchyard

**Sensitive Plants**

- Barrel Cactus
- Variegated Dudleya
- Heart-Leaved Pitcher Sage

**Quino Host Plants**

- Purple Owl's Clover
- USACE and CDFG Jurisdictional Drainages



**Legend**

- Supplemental Survey Area
- Area of Potential Effect
- 15m x 15m Survey Grid

QUAIL BRUSH GENERATION PROJECT

**FIGURE XX  
 SUPPLEMENTAL SURVEY AREA**

