Michael McGuirt - Final Clarifications for Geoarchaeology Field Study, Beacon Project (08-AFC-2), Kern County

From: Michael McGuirt
To: Kenneth Stein
Date: 1/6/2009 4:21 PM
Subject: Final Clarifications for Geoarchaeology Field Study, Beacon Project (08-AFC-2), Kern County
CC: Beverly Bastian; Eric Solorio; Michael K. Lerch; Rick York
Attachments: CEC GEOARCH SOW CLARIFICATIONS 1-06-09MMRYBB.doc; Michael McGuirt.vcf

Dear Kenny,

Please find attached Energy Commission staff comment on the clarifications to the scope of work for the geoarchaeology field study. The comment reflects the protocol that staff proposed on 16 December, the 17 December teleconference that we had to discuss the proposal, and the email that I sent you on 22 December.

Please let me know if you believe anything in the attached comment differs from what we have previously discussed.

Thank you for your time and your efforts to help provide the information that staff needs to complete the cultural resources analysis for this project.

Sincerely,

Mike

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DATE JAN 01 2009
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CEC GEOARCHAEOLOGICAL SOW CLARIFICATIONS **1/06/09**

After a review of the Scope of Work (SOW) provided by the California Energy Commission (CEC) on December 16, 2008, the applicant would add the following clarifications:

- Remote sensing data as referred to in the SOW (p. 5) ~~means~~ includes, among other potential data sources, ~~existing~~ information such as aerial photography and satellite imagery that may already exist or may be acquired expressly for the proposed study;
- The base of each t~~T~~rench~~es~~ will be at least 10 feet in length;
- Depth of trench excavations will, at a maximum, reflect the proposed maximum construction excavation depth (approximately 20 feet);
- Trench studies will focus on project site, not the pipeline corridor, although the landforms and major landform features along the corridor will be mapped;
- Assumes a maximum of three bucket samples per meter of depth for purposes of screening [Please see recordation method 2, p. 6. A "sample" is 3 5-galllon buckets from each "major lithostratigraphic unit in each profile," or, "where lithostratigraphic units are not apparent," where one finds massive, undifferentiated deposits, from each 18 inches of depth. In our 17 December teleconference, I (Mike McGuirt, Energy Commission staff) clarified that 1) a "major lithostratigraphic unit" is a single sedimentary package or a group of such packages that the field observer lumps on the basis of objective criteria, and 2) where multiple lithostratigraphic units are present, the units should be grouped, for the purpose of screening, in such a manner that a minimum of 3 samples, as a screening sample is specified in the protocol (please see above), are screened for every one meter of depth];
- [Please see pp. 6 and 7, Field Sample Design and Design of Field Sampling Methods sections] Assumes a minimum of three trenches per landform and major landform feature with one of the three fully documented using recordation methods 1–3 (p. 6) (the other two notes only [With the caveat that the notes "collect sufficient information to reliably correlate the stratigraphic units in the odd two trenches with the stratigraphic units in the master profile for each landform and major landform feature" (pp. 6 and 7)]); i~~.~~.e., with up to 24 trenches, a maximum of 8 profiles; [The total number of trenches for the study is capped at 24. This means that if 8 ~~eight~~ or more landforms or major landform features are mapped on the project site the applicant need not document more than eight of them with three trenches in each one. In the event that more than eight landforms or major landform features are found, the applicant would choose the eight that are most relevant to the analysis of the project's potential impacts. The criteria for such a selection would be one element of the applicant's field sample design. In the event that less than eight landforms or major landform features are found on the project site, the applicant would need to design the field sample in

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such a way as to ensure that sufficient data is acquired to develop a master stratigraphic column for each mapped landform or major landform feature that is truly representative of each such landform or major landform feature. Hypothetically, if the applicant finds the project site to include only 3 landforms and 2 major landform features, then the applicant would need to decide how many trenches would be necessary to characterize each one of those things. If one of the landforms in this hypothetical scenario were an alluvial fan that spread out over 1,000 acres, then 3 trenches are not going to be sufficient to characterize that massive landform. The sample design would need to take circumstances like this into account. The applicant is not being asked to excavate 24 trenches no~~t~~ matter what, but a logical justification for using fewer trenches would be a critical part of the administrative record for the siting case.]

- CEC staff will provide comments on field sample design and proposed trench locations within 24 hours of submittal;
- No biological monitoring is required, ~~;~~however ~~i~~in-field staff will receive limited biological resources training so that the field staff can recognize sensitive species and are directed to report, by email message, any sensitive species siting(s) to the CEC Project Manager the day of the siting while completing the cultural resources geoarchaeological investigations;
- Open trenches will be covered at night to avoid impacts to sensitive species; in the morning, open trenches will be inspected and sensitive species will be allowed to escape before work is begun; [Kenny – No apologies for adding these two items; it's the minimum to require, given that the project site is sensitive species habitat.]
- An archaeologist will be in the field at all times during the investigations, therefore no archaeological training is required for in-field staff;
- Applicant's consultant can directly contact CEC cultural resources staff regarding the geoarchaeological investigations;
- [The clarifications that follow are from my (Mike McGuirt) 22 December 2008 email to Kenny Stein of Florida Power and Light and Eric Solario of the Energy Commission staff.] A preliminary report will be provided to the CEC after the completion of field investigations and at least 30 days prior to the publication of the Final Staff Assessment (FSA) to allow CEC staff to ~~make significance assessment for~~incorporate the raw field data into the ~~Final Staff Assessment~~FSA; a~~A~~s feasible, results of expedited radiocarbon assays will be included. The applicant will submit a subset of the acquired radiocarbon samples for assay in an attempt to incorporate some radiocarbon data into the preliminary or "field" report; and
- [The clarification that follows is from my (Mike McGuirt) 22 December 2008 email to Kenny Stein of Florida Power and Light and Eric Solario of the Energy Commission staff.]

A final technical report including the results of any remaining radiocarbon assays will be prepared and submitted after the analysis is completed, but prior to the development of the Cultural Resources Monitoring and Mitigation Plan for the project.