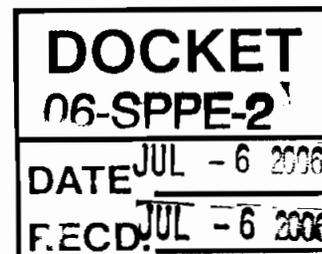


CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512

July 6, 2006

Mr. Henryk Olstowski
Assistant Manager, IID Energy
Imperial Irrigation District
485 E Villa Road
El Centro, CA 92243



Dear Mr. Olstowski:

**SUPPLEMENTAL DATA REQUESTS 33 TO 36 FOR THE EL CENTRO UNIT 3
REPOWER PROJECT (06-SPPE-2)**

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff is asking for 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, and 4) assess potential mitigation measures.

The requested information is in the technical area of Cultural Resources. Written responses to the enclosed data requests are due to the Energy Commission staff on or before August 7, 2006.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both Commissioner Jeffrey D. Byron, Presiding Committee Member for the El Centro Unit 3 Repower project, and to me, within 10 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please call me at (916) 651-8891, or email me at mdyas@energy.state.ca.us.

Sincerely,

Mary Dyas, Project Manager
Systems Assessment and Facilities Siting
Division

Enclosure
cc: POS

El Centro Unit 3 Repower (06-SPPE-2) Draft Data Requests

Technical Area: Cultural Resources
Author: Beverly E. Bastian

BACKGROUND

The old Steam Turbine Building is more than 45 years old and recommended as eligible for listing on the California Register of Historic Resources (CRHR). Therefore impacts to the building resulting from the proposed project must be assessed for significance. The application, a staff site visit, and consultation with El Centro Generating Station operators have indicated that the direct physical impacts to the west facade of the Steam Turbine Building resulting from the integration of the new CTG/HRSG with the old Unit 3 steam turbine would consist of creating a few new holes in order to install pipes and a catwalk. A by-product of the repower, however, which must be considered an impact as well, is that a large hole would be left in the west wall of Unit 3 when the boiler is removed, after the repower is completed and operating. The Unit 3 part of the Steam Turbine Building has not been previously altered, and so staff needs more information to assess the significance of the proposed project's impacts on the Unit 2 and Unit 3 parts of this significant building.

DATA REQUESTS

33. Please discuss using the sealed former opening where Unit 2's boiler used to be to install the new connecting elements (pipe rack, catwalk, etc.) of Unit 3 in the west wall of the Steam Turbine Building, as a means of avoiding removal of original material, avoiding damage to existing original openings such as doors and windows, and restricting impacts to only non-historic fabric.
34. Please discuss using *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* as a guide to filling in the hole which would be left when the Unit 3 boiler is removed, as a means of appropriately rehabilitating the west wall of this now historic building, compared to the previous infills done for Units 1 and 2.

BACKGROUND

The geotechnical study recommends that the applicant remove 4 feet of fill from the repower site and either restore and compact it or replace it with a less compressible material which is then compacted (IID 2006, App. C:9). The application does not indicate whether this would be done. Nor does it identify any off-site borrow or disposal areas, if the removal and replacement would be done. Staff needs to know if there would be off-site borrow and disposal areas.

**EI Centro Unit 3 Repower (06-SPPE-2)
Draft Data Requests**

DATA REQUEST

35. Please discuss whether the native and fill soils over most of the impact area would be removed and replaced. If so, please provide reports of the dates, personnel, methods, and findings from any cultural resources surveys of the borrow and disposal sites, or explain why no surveys are needed. If borrow and disposal sites are not commercial operations and consequently have not been surveyed for cultural resources, please conduct such surveys and provide the methods and findings to staff.

BACKGROUND

The applicant states that “the area to be affected by the undertaking has been largely developed and subsurface ground disturbance is not expected below a level that has not already been disturbed. Therefore, archaeological resources are not anticipated ...” (IID2006a: 6.4-25). To fully assess the potential of the proposed project for encountering buried archaeological deposits, staff needs to know on what evidence the applicant is basing the above statement.

DATA REQUEST

36. Please discuss the possibility of encountering buried archaeological deposits during the installation of the proposed repowering equipment and construction of the accompanying natural gas line and electrical interconnection line. Please provide the evidence on which you relied to reach the above conclusion, including the extent of excavation for all major project components, findings from previous archaeological testing documented in California Historical Resources Information System reports and records from the area, and findings from the geotechnical report for this project.