

2.0 SUPPLEMENTAL RESPONSE TO INFORMATION REQUEST

2.1 Cultural Resources

2.1.1 Data Request Number 4

Comment

Please clarify who conducted each survey, explain whether it was an architectural or archaeological survey and discuss the qualifications of the surveyors who conducted archaeological surveys in light of Secretary of Interior Standards.

Original Response

The following surveys were conducted for this project:

1. An archaeological survey was conducted of 2715 E. 50th Street (the subject property) and the pipeline linear on Seville Ave. by Dan Falt of William Self Associates, on July 3, 2001. The principal investigator in charge of the work was William Self (see attached resumes for Dan Falt and William Self in Appendix A).
2. An architectural survey was conducted of the subject property and the pipeline linear on Seville Ave., including an inspection of the built environment one building deep surrounding the subject property, by Michael P. Pumphrey of EarthTech, on August 24, 2001 (see attached resume in Appendix A).
3. An archaeological survey was conducted of the reclaimed water pipeline route by Juliet Christy of Greenwood and Associates, on October 30, 2001 (see attached resume in Appendix A).
4. An additional architectural survey was conducted of the project linears and the laydown, parking, and storage areas by Kelly Heidecker of Parsons, on June 10-11, 2002 (see attached resume in Appendix A). The detailed report will be submitted to the CEC by July 2002 (see Response to Comment 8 for additional details).
5. An additional archaeological survey was conducted of the laydown, parking, and storage areas by Kelly Heidecker concurrently with the architectural survey of the area. The detailed report will be submitted to the CEC by July 2002.

Supplemental Response

The additional archaeological survey of the parking and laydown areas has been conducted. This survey is presented as part of the Cultural Resources Inventory Report prepared by Parsons for the City of Vernon. A copy of the report is included as Attachment 1.

2.1.2 Data Request Number 7

Comment

Please thoroughly assess the potential for undetected, buried or near surface archaeological resources in the project area. Evaluate the historic topography of the project area, including areas of proposed plant construction, laydown, storage and parking areas and project linears.

Original Response

The average depth of construction at the project site will be 4 feet with excavation extending to 8 feet below the HRSG foundation. The maximum depth of excavation for the gas line will be approximately 9 feet, the maximum depth of excavation for the sewer line will be 10.5 feet, and the maximum depth of excavation for the pipeline will be 12 feet. No significant grading will be required at the laydown, storage, or parking areas.

The Geologic Hazards Section (8.15) of the AFC indicates that the plant site rests upon approximately 4 feet of modern or historic fill containing some amount of rubble in the form of "asphaltic concrete" (AFC page 8.15-2). It is unlikely that there will be any near-surface intact cultural deposits within this 4-foot fill zone.

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station, that will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and reclaimed water pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

The Cultural Resources Inventory Report has been completed. A summary of the findings is presented here. The complete report is provided as Attachment 1 of this document. The archaeological and architectural APE for this project was established by Parsons in coordination with the California Energy Commission Cultural Resources staff. The APE includes the site of the Vernon Power and Light Plant and the laydown, parking and storage areas (the "staging areas"), and extends to include each structure facing the site. Along the linears, the APE extends to 100 feet from the centerline of the pipelines.

The project APE is an industrial-urban complex with 100 percent ground coverage. The archaeological findings are based on a geoarchaeological assessment of available literature and a surface reconnaissance of the project area. No archaeological sites are located within the APE and the likelihood of encountering intact, significant subsurface cultural resources is very low.

2.1.3 Data Request Number 8

Comment

Please summarize the information available on historic maps for the project area, including Sanborn, USGS, GLO, and county maps through time and provide a summary of land use prior to 1931 for the project site. Please provide staff with copies of pertinent sections of consulted maps.

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

A record search was conducted by William Self Associates on July 2, 2001 at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System at California State University-Fullerton, Fullerton, California, by SCCIC staff. A copy of the record search results is presented in the Cultural Resources Inventory Report. The search included a review of all recorded historic and prehistoric archaeological sites within a ½-mile radius of the project site on E. 50th Street, as well as a review of all known cultural resource reports. In addition, historic maps, the California State Historic Resources Inventory, the National Register of Historic Places, the listing of California Historical Landmarks in the region, and the California Points of Historical Interest were also reviewed by SCCIC staff. No prehistoric or historic

archaeological sites were identified by the record search. An additional record search was conducted in person by Juliet L. Christy of Greenwood and Associates on October 18, 2001. The search included a review of available literature, archaeological site archives, and relevant historical maps on file at the SCCIC, for the area within a ½-mile radius of the project linears along Seville Avenue, E. 50th Street, Boyle Avenue/State Street, and Randolph Street. Additional archival research was conducted in June 2002 at the California State University-Northridge Map Library, the Los Angeles County Assessors Office, the City of Vernon Chamber of Commerce, and the Bureau of Land Management Office, Sacramento, California. Documentation reviewed included Sanborn Fire Insurance Maps, General Land Office (GLO) maps, tax assessors rolls, and photographs. A review of the earliest Sanborn Maps available for the project area (1920, 1928, 1929) confirms that the City of Vernon has always been, as it claims, an “exclusively industrial” city. The industrial and commercial structures over 50 years of age that remain extant within the project area continue, for the most part, to be used for their original purpose, if not also by the original owners (i.e. textile manufacturing, glass manufacturing, auto repair, etc.). Rail lines and spurs that remain in place today are indicated on the Sanborn maps in many of their original configurations, evidencing that the parceling system of the City has not been altered significantly over the past 80 years. The oldest residential structures in the project area, 1918-1919, appear on the Sanborn maps amongst other scattered dwellings and the occasional restaurant; south of Slauson Ave. and along Randolph Street as is the case today.

2.1.4 Data Request Number 9

Comment

Please provide information from historic County Tax Assessor plats and roles and other county records regarding the location of any buildings on site and ownership of the project site prior to 1931. Depict approximate locations of past residential, commercial or industrial buildings on Figure 6.1-2 of the AFC or similar site plan.

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures’ potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended

to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

No county tax records could be found for the existing power plant site location. There are no records of any building existing at the site or any previous owners prior to becoming a power plant.

2.1.5 Data Request Number 10

Comment

Please thoroughly evaluate the potential for encountering undetected, buried or near surface historic archaeological resources in the proposed construction area, in light of information obtained through research with historic maps and the County Tax Assessor plats and roles.

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

Since no records of prior structures or ownership at the current power plant site were found, the likelihood of encountering intact, significant subsurface cultural resources is very low.

2.1.6 Data Request Number 13

Comment

If any such resources are over 45 years old and identified adjacent to the proposed project site or within one hundred feet of the center line of project linears and could have their immediate surroundings altered (change in the integrity of the setting) by this project in such a manner that the significance of the historical resource would be materially impaired, and it has not been recorded on a Department of Parks and Recreation (DPR) 523 form, then please record the cultural resources on the DPR 523 form and provide a copy of the form.

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

No adverse effects have been identified related to the construction or operation of the Malburg Generating Station project. The construction of the project adjacent to Station A will not create an adverse visual effect on the potentially historical structure as it is appropriate to the historic setting of the site and the region as an "exclusively industrial" city. Additionally, construction of the project linears will have no adverse effect on any historic structures as the linears will be constructed below the centerline of the roads, which will be returned to their pre-construction appearance prior to completion of the project. None of the 32 historic structures appear to be structurally unsound or at risk for collapse or damage, therefore, vibrations related to construction activities would have no adverse effect on these historic structures. DPR 523 forms have been filled out for these 32 structures and are included in the Cultural Resources Inventory Report in Attachment 1.

2.1.7 Data Request Number 14

Comment

If any of the resources could be impacted by the project or could have their immediate surroundings altered (change in the integrity of setting) by this project in such a manner that the significance of the historical resource would be materially impaired, please provide a discussion of the significance of the resources under CEQA Guidelines Section 15064.5(a), (3), (A)(B)(C) and (D).

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

The California Environmental Quality Act Guidelines Section 15064.5 includes provisions for significance criteria related to archaeological and historical resources. A significant archaeological or historical resource is defined as one which meets the criteria of the California Register of Historical Resources, is included in a local register of historic resources, or is determined by the lead agency to be historically significant. A significant impact is characterized as a "substantial adverse change in the significance of a historical resource." No adverse effects have been identified related to the construction or operation of the Malburg Generating Station project. The construction of the project adjacent to Station A will not create an adverse visual effect on the potentially historical structure as it is appropriate to the historic setting of the site and the region as an "exclusively industrial" city. Additionally, construction of the project linears will have no adverse effect on any historic structures as the linears will be constructed below the centerline of the roads, which will be returned to their pre-construction appearance prior to completion of the project. None of the 32 historic structures appear to be structurally

unsound or at risk for collapse or damage, therefore, vibrations related to construction activities would have no adverse effect on these historic structures.

2.1.8 Data Request Number 15

Comment

Please provide information regarding age and potential historic importance of these railroad features and any others located within or adjacent to the existing site or proposed pipelines to the City of Vernon and to the region.

Original Response

The significance of the railroad features located within the project area will be discussed in the Cultural Resources Inventory Report under preparation. However, preliminary research indicates that the tracks and spurs were constructed for industrial uses in conjunction with the plants and warehouses in the area. It is unlikely that additional research will reveal that these railroads are historically significant in any manner other than as contributing elements to a historic district, if one is determined to be present within the project area.

Supplemental Response

Union Pacific Railroad owns and operates a railline that runs parallel to Randolph Street within the project area. The largest concern at the time for the City of Vernon involved train crossings along their streets. Three major rail carriers and the Los Angeles Junction Railway (LAJ) created increased traffic problems in the region that included no less than 200 grade crossing conflicts. In an effort to improve the situation, construction of the Alameda Corridor began in April of 1997. The 20-mile long corridor that runs parallel to Downey Road is a dedicated cargo expressway linking the Ports of Los Angeles and Long Beach via Vernon, Bell, and the City of Commerce. Highlighting the project is the Mid-Corridor Trench, which carries freight trains "in an open trench that is 10 miles long, 33 feet deep and 50 feet wide between State Route 91 in Carson and 25th Street in Vernon where it veers northeast to the yards." In essence, the Corridor consolidates four low-speed branch lines, which in turn eliminates hundreds of grade-crossing conflicts. No other information is available regarding these railroads in regards to their historical importance.

2.1.9 Data Request Number 16

Comment

Please provide a characterization of the buildings in the area within 100 feet of the project linears (age, industrial, residential, {original use} {current use} and/or ethnic etc.).

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

The project site is located in an area of industrial-urban development varying widely from large-scale plant/manufacturing, to distribution, and small sole-proprietorships. Structures in the project area range in construction dates from 1916 (a residence at the corner of Hood Avenue and Randolph Street) to the 1990s. Building functions and heights also vary widely from low, sprawling one-story warehouses to silos, smoke stacks, and conveyor belt systems exceeding four-story heights (for example, the Owens-Brockway/Owens-Illinois Glass Container Manufacturing complex located between E. 50th Street and Fruitland Ave.)

The architectural survey conducted by William Self Associates in August 2001, identified and recorded the City of Vernon Power and Light Plant - Station A. The architectural survey conducted by Parsons in June 2002 identified and recorded 31 additional historic structures within the APE; 8 residential structures (25 percent of all historic structures), and 23 industrial/commercial buildings (75 percent of all historic structures).

Research of the available literature did not reveal any information on the 32 historic structures (excluding the Vernon Power Plant) that would justify their being considered potentially eligible to the National or California Registers under any of the standard criteria. Therefore, the structures greater than 45 years in age (excluding the Vernon Power Plant) have been recorded on DPR Primary Record and BSO forms, but have not been formally evaluated for historical significance.

2.1.10 Data Request Number 17

Comment

Prior to evaluating the property under the California Register criteria as stipulated in CEQA Guidelines Section 15064.5(a), (3), (A), (B), (C), and (D), please establish a thorough historic context to support the evaluation.

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

The main building (Station A Power Plant), constructed in 1932, and the switchyard, constructed circa 1947, are the only remaining features at the project site that are older than 45 years. The Station A building contains the Johnson & Heinze Diesel Plant (five diesel-fueled reciprocating, internal combustion generators, Units 1 through 5, each rated at 3.5 MW output) the H. Gonzales Generating Station (two natural gas-fired CTG units, Units 6 and 7, each rated at 5.5 MW output), and the Control Room.

The construction of the original cooling tower started in 1932 and was placed into operation on June 19, 1933. This cooling tower was replaced with a new cooling tower in 1990. All other original structures at the MGS project site, including the pump house and above ground fuel/oil tanks were removed in 2001. Review of records on file at the SCCIC revealed no indication that any of these structures were formally recorded prior to demolition and removal. However, the pump house and cooling towers are listed as "Associated Structures" in the August 22, 2001 Primary Record for the City of Vernon California Power Plant, prepared by Michael Pumphrey.

There are no changes planned to the H. Gonzales Generating Station or the Control Room. The Control Room is the dispatch center for the City's electrical and water systems, provides switching operations via Supervisory Control and Data Acquisition (SCADA), and houses the staff that performs real-time power scheduling. If the MGS Project is closed as discussed in Section 4.0 of the AFC, the H. Gonzales Generating Station and the Control Room will continue to function as they are prior to the Project. The H. Gonzales Generating Station will continue to operate to supply the peak load of the City. Operation of the City's electric and water systems and real-time power scheduling will continue to be provided from the Control Room. The City intends to allow a non-profit historic preservation corporation to take over the upkeep, care and preservation of the Station A building and the Johnson & Heinze Diesel Plant, including the Control Room.

2.1.11 Data Request Number 18

Comment

In consideration of the plant's status as the second largest diesel generating plant in the world at the time it went on-line, please discuss the significance of the property under Criterion A (association with events that have made a significant contribution to the broad patterns of history) and B (association with lives of persons significant in our past).

Original Response

Based on its history, Station A should be eligible for the National Register under criteria A and C (and to the California Register under criteria 1 and 3), but not under criteria D of the National Register. The Malburg Generation Station Project, Cultural Resources Inventory Report, currently under preparation, will discuss the Station's historical importance and update the evaluation to correctly reflect it's eligibility under criteria A and C of the National Register and criteria 1 and 3 of the California Register.

Supplemental Response

Station A is eligible to the National and California Registers under criteria A and 1 (respectively) (significant events in our National and State history) because of its importance in the industrial development of the City of Vernon, and thus the Los Angeles area, by providing a source of cheap electrical power separate from what was being offered by the corporate giant, the Edison Company.

2.1.12 Data Request Number 19

Comment

To support the evaluation under criterion D, please apply the historic context in the evaluation of the equipment and develop pertinent research questions to demonstrate the connection between the important information potential and the equipment in order to support a Criterion D assessment. Conversely, please reconsider the engineering design and equipment's importance under Criterion C.

Original Response

As noted in Response to Comment 18 above, Station A should be eligible for the National Register under criteria A and C (and to the California Register under criteria 1 and 3), but not under criteria D of the National Register. The Malburg Generation Station Project, Cultural Resources Inventory Report, currently under preparation, will discuss the Station's historical importance and update the evaluation to correctly reflect its eligibility under criteria A and C of the National Register and criteria 1 and 3 of the California Register.

Supplemental Response

Station A is also eligible to the National and California Registers under criteria C and 3, respectively (significant design characteristics) because of its strong Art Deco vernacular architectural style in an industrial area, as well as the innovative use of the electric generating equipment for its period of significance (1930-1940). Both the building and the equipment it contains retain a high level of integrity in location, design, setting, materials, workmanship, feeling, and association.

2.1.13 Data Request Number 20

Comment

Please provide dates of construction for the cooling tower, and switchyard. In accordance with *Instructions for Recording Historical Resources Manual* (State Office of Historic Preservation 1995), please provide DPR 523A and DPR 523B forms for resources over 45 years of age within the project site.

Original Response

The construction of the original cooling tower started in 1932 and was placed into operation on June 19, 1933. This cooling tower was replaced with a new cooling tower in 1990. All other original structures at the MGS project site, including the pump house and above ground fuel/oil tanks were removed in 2001. Review of records on file at the

SCCIC revealed no indication that any of these structures were formally recorded prior to demolition and removal. However, the pump house and cooling towers are listed as "Associated Structures" in the August 22, 2001 Primary Record for the City of Vernon California Power Plant, prepared by Michael Pumphrey.

The main building (Station A Power Plant), constructed in 1932, and the switchyard, constructed circa 1947, are the only remaining features at the project site that are older than 45 years. Forms DPR 523A (Primary Record) and 523B (Building, Structure, and Object [BSO]) for the main building are provided in Appendix J4 of the AFC.

A Primary Record and BSO form will be prepared for the switchyard and included in the Cultural Resources Inventory Report currently under preparation.

Supplemental Response

The Primary Record and BSO forms have been prepared and are included in the Cultural Resources Inventory Report presented in Attachment 1 of this document.

2.1.14 Data Request Number 21

Comment

Please provide a discussion of the significance of these resources under CEQA Guidelines Section 15064.5(a), (3), (A), (B), (C), and (D) and provide staff with a copy of the assessments and the specialist's conclusions regarding the resource(s).

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

The California Environmental Quality Act Guidelines Section 15064.5 includes provisions for significance criteria related to archaeological and historical resources. A significant archaeological or historical resource is defined as one which meets the criteria of the California Register of Historical Resources, is included in a local register of historic resources, or is determined by the lead agency to be historically significant. A significant impact is characterized as a "substantial adverse change in the significance of a historical resource." No adverse effects have been identified related to the construction or operation of the Malburg Generating Station project. The construction of the project adjacent to Station A will not create an adverse visual effect on the potentially historical structure as it is appropriate to the historic setting of the site and the region as an "exclusively industrial" city. Additionally, construction of the project linears will have no adverse effect on any historic structures as the linears will be constructed below the centerline of the roads, which will be returned to their pre-construction appearance prior to completion of the project. None of the 32 historic structures appear to be structurally unsound or at risk for collapse or damage, therefore, vibrations related to construction activities would have no adverse effect on these historic structures.

2.1.15 Data Request Number 24

Comment

Please discuss the impacts of the project on all contributing elements of the historic facility, such as the switchyard, vegetation, railroad spur, cooling tower, Station A, or others.

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

No adverse effects have been identified related to the construction or operation of the Malburg Generating Station project. The construction of the project adjacent to Station A will not create an adverse visual effect on the potentially historical structure as it is appropriate to the historic setting of the site and the region as an “exclusively industrial” city. Additionally, construction of the project linears will have no adverse effect on any historic structures as the linears will be constructed below the centerline of the roads, which will be returned to their pre-construction appearance prior to completion of the project. None of the 32 historic structures appear to be structurally unsound or at risk for collapse or damage, therefore, vibrations related to construction activities would have no adverse effect on these historic structures.

2.1.16 Data Request Number 25

Comment

Please provide dates of construction for all buildings adjacent to the project site. In accordance with *Instructions for Recording Historical Resources Manual* (State Office of Historic Preservation 1995), please provide DPR 523A and DPR 523B forms for resources over 45 years of age. (Staff is available to discuss the merits of recording or evaluating potential cultural resources).

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures’ potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

The project APE is an industrial-urban complex with 100 percent ground coverage. The archaeological findings in this report are based on a geoarchaeological assessment of

available literature and a surface reconnaissance of the project area. No archaeological sites are located within the APE and the likelihood of encountering intact, significant subsurface cultural resources is very low. DPR 523 series forms have been filled out for the 32 structures identified as being older than 45 years of age and included in the Cultural Resources Inventory Report presented in Attachment 1.

2.1.17 Data Request Number 26

Comment

Please provide a discussion of the industrial development of this area in the City of Vernon through time and place the individual buildings within this context.

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

Vernon was founded and incorporated in 1905 by the Furlong brothers and John Leonis. Attempts were made by the City of Los Angeles to annex the area as early as 1893 whereby the City of Los Angeles had already acquired the western portion of Vernon (then known as Vernondale). Leonis is often credited with mounting the first campaign to incorporate in 1902 in order to thwart annexation attempts. Leonis also feared preemption efforts by Henry Huntington, who attempted to incorporate the Vernon area into his newly developed Huntington Park.

It was in 1907, on land leased from Leonis, that entrepreneur Jack Doyle opened what some claimed was the longest bar in the world. Doyle could boast it took 37 bartenders with 37 cash registers to run the place. Next door to the bar, Doyle constructed a world class boxing arena (Vernon Avenue Arena). Soon, nightclubs, slot machines and

“working women” turned Vernon into what resembled a “Las Vegas avant l’ lettre, as Leonis and the Furlong shared the spoils with the era’s most colorful gamblers and sports promoters.” In addition, the Pacific Coast Baseball League built a stadium that supported the newly formed Vernon Tigers who won three consecutive league pennants.

With the establishment of the Los Angeles Union Stockyards came the creation of the Central Manufacturing District (CMD). Under the auspices of the group Central Manufacturing District, Inc., property was financed and developed along the lines of its Chicago counterpart. By 1923, nearly a half dozen buildings were under construction, costing over \$1,000,000, with plans for further expansion, which would eventually add to the commercial wealth of Los Angeles. In addition, the Los Angeles Junction Railway was established (1922), cutting out expensive switching charges with the three major railroads that bisected the region.

With the establishment of the CMD and the vast internal improvements that followed (i.e., paved streets, sewer systems etc.) the City of Vernon began to thrive during the decade of the 1920s. Heavy industries located in the area. In the following decades other diversified manufacturers including box and paper concerns, aerospace, drug companies and food processing enterprises would also occupy a place in Vernon’s industrial enclave. Vernon was now “Exclusively Industrial”.

Vernon’s industrial growth skyrocketed during the decade of the 1920s. Even more industrial expansion occurred during the 1930s and beyond. According to a City of Vernon publication, one of the most important events to take place during the 1920s was the development of the East Los Angeles Industrial District by the Union Pacific Railroad Company. With projects like these, Vernon’s industrial complex (along with the CMD) would soon become one of the largest entities of its kind on earth.

Today, the City of Vernon continues to live up to the motto “Exclusively Industrial.” Combined with the CMD and surrounding industrial communities, the City of Vernon shares a role in the ever-increasing industrial growth of southern California in particular, and the west coast in general.

2.1.18 Data Request Number 27

Comment

Please assess the potential for a cohesive industrial district that includes the buildings discussed in Appendix J-4 and the existing power plant complex and provide a discussion of the significance of the district and its elements under CEQA Guidelines Section 15064.5(a), (3), (A), (B), (C), and (D). Please provide staff with a copy of the assessments and the specialist’s conclusions regarding the resource(s).

Original Response

A detailed Cultural Resources Inventory Report is under preparation for the Malburg Generation Station. The report will present a historic context of the project area from which the historical significance of existing structures would be evaluated. It will present the findings of the historical research, including a summary of the review of Sanborn Fire Insurance Maps, and other historic maps. The report will identify the number and type of structures located within a 100-foot distance from the centerline of the project linears, and a 100-foot distance from the project site boundaries. The report will assess the identified structures' potential for historical significance under current CEQA guidelines, and the potential for project impacts to these structures. Structures within this area that are greater than 45 years old will be recorded on DPR 523 series forms and appended to the report. In addition, the report will assess the likelihood of encountering archaeological deposits below the HRSG foundation where excavation will extend deeper than 4 feet, as well as along the gas line, sewer line, and pipeline routes. This report will be submitted to the CEC by July 2002.

Supplemental Response

Refer to response 2.1.17, Data Request Number 26.

2.2 Soil and Water Resources

2.2.1 Data Request Number 64

Comment

Please provide drainage plans with proposed contours showing existing and proposed watershed areas, drainage channels, peak discharge rates and volumes at key concentration points, and conceptual design and capacities of the proposed conveyance systems, erosion control features, detention basin and holding tanks. The contact and non-contact drainage systems and design should be clearly differentiated in terms of location, watershed area, drainage conveyance design, storage system design, peak flow rates and runoff volumes. The plan should include post-development storm water discharge rates and volumes for contact and non-contact areas for the 5, 10, 25- and 100-year recurrence intervals. Provide a description of how frequently runoff volumes are expected to exceed the capacity of the detention basin and holding tank, and how excess runoff will be accommodated and prevented from carrying contaminants off-site in the event of back-to-back storms or storms in excess of the storage capacity. Please provide a narrative description as well as conceptual plans and design details with all back-up hydrologic and hydraulic calculations used in developing the drainage concept design.

Original Response

With our conceptual design to date, we have addressed elements of the site and off-site hydrology related to storm water runoff. The City is preparing a detailed hydrology study report to specifically address this comment. The hydrology study is expected to be completed by July 2002. The report will include the layout(s) of storm water conveyance systems with technically-feasible ranges of storm runoff capacity. These plan layouts and any preliminary profiles will be supported by the results of the hydrology study. However, design details associated with storm water drainage conveyance systems would not be part of the conceptual design drawings, but would be part of a detailed design package.

Supplemental Response

The hydrology study has been completed and is summarized below. The complete hydrology report is provided as Attachment 2.

The total drainage area of the project site of 3.4 acres and consists of 3.3 acres of non-contact drainage area and only 0.1 acre of contact drainage area. The contact drainage area, as depicted on the proposed condition hydrology map, mainly includes curbed areas for the boiler feed pumps, transformers (GSU-1, GSU-2, and GSU-3), and aqueous ammonia equipment. Storm water that falls inside these curbed areas will be impounded, tested and pumped to the appropriate discharge facilities. The runoff from these areas is segregated from the runoff of the non-contact areas and doesn't contribute to the peak flow. The non-contact drainage area consists of mainly open areas, roofed/enclosed equipment, parking areas, buildings and concrete access roads. These areas are assumed to have no storm water runoff contamination from oil and hydrocarbons. The County of Los Angeles Department of Public Works Hydrology and Sedimentation Manual is utilized to conduct the hydrology and peak flow rates for the non-contact areas.

From the results of the existing condition hydrology calculations, the peak flow rate at the southeast corner of site exiting into Soto Street is estimated at 3.0 cfs, 3.6 cfs and 4.4 cfs for the 10-Year, 25-Year and 50-Year rainfall frequency, respectively. The proposed condition hydrology calculations show peak flow rate of 4.3 cfs, 4.9 cfs and 6.0 cfs for the same respective storm period. It can be seen that there is a slight increase in peak storm runoff due to the proposed development to this side of the project site. For the 50-Year storm, the increase is 1.6 cfs. The runoff volume that needs to be retained on site from this increased flow is approximately 326 cu. ft. The SUSMP retention volume requirements are estimated to be roughly 1900 cu. ft., which will readily contain the estimated 326 cu. ft.

The length and slope from the initial drainage sub-area to the discharge point at the southwest corner of the site exiting into Seville Avenue is longer and flatter for the

proposed condition as compared to the existing condition. Therefore, no increase in peak runoff is expected for the southwest corner of the site exiting into Seville Avenue. The time of concentration for peak flow from the shorter and steeper northwest corner of the site would have gone by when the time of concentration and peak flow from the initial sub-area water shed arrives. Even though the peak flow does not increase, there is still an overall increase in storm water runoff volume over the duration of storm event. This volume is calculated to be 2,268 cu ft, which is more than the volume originally calculated (1,900 cu ft) under the SUSMP guidelines. A storm water retention basin will be designed to retain 2,268 cu ft of storm water, which will provide enough capacity to accommodate the excess runoff volumes. No excess runoff volume is expected to flow offsite even in the event of back-to-back storms. Hydraulic engineering calculations will be provided in the detailed engineering phase to properly size the retention structure.