

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 18, 2021

Ms. Lori Charpentier
Licensing/Regulatory Affairs
Southern California Edison
2244 Walnut Grove Ave.
Rosemead, CA 91770

Re: Data Request #11 for the SCE Ivanpah-Control (I-C) Project (A.19-07-015)

Dear Ms. Charpentier:

Southern California Edison Company (SCE) submitted its Amended Permit to Construct (PTC) application and Proponent's Environmental Assessment (PEA) on April 13, 2020. The PTC Application has not been determined to be complete because the determinations of cultural resource eligibility for the California Register of Historical Resources (CRHR) have not been made.

Eligibility recommendations for most resources have been made using data from information collected during the pedestrian survey and from archival research. The eligibility recommendations for a smaller subset of archaeological resources will be made using archaeological testing. Archaeological testing involves ground disturbing excavations that have the potential to result in impacts to sensitive resources. An Archaeological Testing Plan is being prepared; the Plan is currently being reviewed by the CPUC archaeology team and the BLM team.

We understand that SCE has sent letters to all private and State landowners that have potentially eligible resources on their land, requesting permission to complete archaeological testing. With regard to these letters, we have two requests:

1. Please send me a copy of all letters that SCE has sent regarding the upcoming testing.
2. We request that SCE refrain from finalizing any agreements with landowners regarding the disposition of artifacts found on private and State land, until the CPUC can speak with the AB 52 consulting tribes about these resources, the proposed testing methods, and disposition of any artifacts collected as part of its AB 52 Native American Consultation process. We anticipate that this consultation will result in the statement of tribal preferences regarding the disposition of artifacts, and it is critically important that the CPUC listen to the tribes' input on this topic.

Please provide this information within 2 weeks, by December 1, 2021. Please provide a copy of the response to me and one to Susan Lee at Aspen Environmental Group, in electronic format only.

Additional data requests may be necessary to address other issues as we move forward with EIR preparation. Any questions on this data request should be directed to me at (916) 217-5073 or by email at john.forsythe@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Forsythe".

John E. Forsythe
Project Manager for the I-C Project

Energy Division CEQA Unit

cc: Rosalie Barcenas, Southern California Edison
Christine Root, CPUC Energy Division, CEQA Group Supervisor
Joan Patrovsky, Project Manager, BLM
Susan Lee, Sandra Alarcón-Lopez, and Beth Bagwell, Aspen Environmental Group
Susanne Heim, Panorama Environmental
Peter Rocco, Jo Render, Galileo
Jace Fahnestock and Kelly Green, Northwind
Paul Callahan, Burns and McDonnell