

Southern California Edison
Presidential Substation Project A.08-12-023

DATA REQUEST SET Presidential ED-06

To: ENERGY DIVISION
Prepared by: Natasha Tabares
Title: Archaeologist
Dated: 01/06/2011

Question 01:

Questions regarding the implementation of APMs CUL-2, CUL-3, and CUL-4: site capping at CA-VEN-744

Will the new TSP (and footing) proposed to be constructed within the boundaries of CA-VEN-744 be installed within the footprint of the existing TSP? Does SCE anticipate any disturbance of native (undisturbed) soil associated with this replacement?

Response to Question 01:

The new TSP proposed to be constructed within the boundaries of CA-VEN-744 would not be installed within the footprint of the existing TSP because the existing conductor needs to remain suspended on the existing TSP during installation of the new pole. After the new TSP is constructed the conductor will be transferred to the new pole and the existing TSP would be removed. These activities would include the disturbance of native soil.

In anticipation of the disturbance to native soil at the archaeological site, SCE proposed APM-CUL-1 Cultural Resources Treatment Plan (CRTP). The CRTP will include a systematic data recovery plan to be implemented within the footprint where the new TSP will be installed in order to minimize the impacts to the archaeological site.

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Question 02:

Questions regarding the implementation of APMs CUL-2, CUL-3, and CUL-4: site capping at CA-VEN-744

Is a more detailed implementation plan for site capping procedures (prepared by an archaeologist in consultation with project engineers) forthcoming?

Response to Question 02:

The conceptual design for the partial capping of the archaeological site submitted to the CPUC and ESA as Presidential ED-04 Q.01 Update 4 was a result of discussions between the SCE project archaeologist and the project civil engineer.

Considerations for the design included protecting the archaeological site from potential damage due to vehicular traffic during construction and maintenance and to support the heavy equipment required to install the subtransmission structure.

All activities associated with the partial capping of the archaeological site, construction of the earthen pad and installation of the geonetting along the access road will be monitored as stated in APM-CUL-6 Native American Monitoring and APM-CUL-7 Archaeological Monitoring. The requirements of APM-CUL-6 and APM-CUL-7 will be included as part of the Cultural Resources Treatment Plan (CRTP) (APM-CUL-1).

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Question 03:

Questions regarding the implementation of APMs CUL-2, CUL-3, and CUL-4: site capping at CA-VEN-744

Why is capping considered appropriate for this site?

Response to Question 03:

Under CEQA, impacts to archaeological resources due to project construction may be mitigated by implementing one or more of the following measures: avoidance, excavation (data recovery), or capping of the site. SCE considered all three measures for potential minimization of impacts to CA-VEN-744; the reasoning used in evaluating these measures is described below:

Avoidance: Site avoidance could only be achieved by spanning CA-VEN-744. Spanning CA-VEN-744 would require that SCE place the proposed TSP outside of the site's boundaries. Due to the existing topography where the archeological site is located (i.e. on a hill between two valleys), the existing subtransmission facilities, and the dimensions of the site, spanning the site was deemed impractical due to engineering constraints and potential additional environmental impacts (i.e. visual).

Excavation (Data Recovery): Complete excavation of the portions of the archaeological site that have the potential to be impacted by the Proposed Project would involve disturbance of a large portion of CA-VEN-744. Data recovery in essence is a measure that should be used when there is no other measure to minimize impacts, due to the destructive nature of the process, time associated with excavation and the expense. SCE has proposed the use of data recovery only in those areas where no other measure is possible, such as the footprint of the new TSP within CA-VEN-744.

Capping: Capping is an effective way to protect an archeological site from the impacts caused by a project when other measures, such as avoidance or data recovery, are not adequate. Capping will preserve CA-VEN-744 from future damage by natural and human agents, such as erosion and maintenance of the subtransmission facilities and access roads. Capping ensures the archaeological site will be preserved in place without the need for disturbance. Furthermore, capping of a portion of CA-VEN-744 is more cost effective than data recovery.

SCE recommends protecting those areas of the archaeological site that have the potential to be impacted by the Proposed Project by implementing APM-CUL-2 Installation of Geonetting along Access Road, APM-CUL-3 Capping of Archaeological Site on Potential Impact Areas, and APM-CUL-4 Construction of the Earthen Pad. These measures are designed to protect the site from potential damage due to vehicular traffic during construction and maintenance and to support the heavy equipment required to install the TSP.

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To: ENERGY DIVISION
Prepared by: Saeed Sadeghi
Title: Project Engineer
Dated: 01/06/2011

Question 04:

Questions regarding the implementation of APMs CUL-2, CUL-3, and CUL-4: site capping at CA-VEN-744

What kind of geotextile fabric will be used and why?

Response to Question 04:

The following response is provided based on preliminary engineering conducted thus far by SCE:

The proposed geotextile fabric is a high strength geogrid made of high-density polyethylene resins, which are chemically inactive. This geogrid mat interlocks with the soil fill material over it and provides soil-to-soil friction when placed directly over the existing ground. Soil friction is required to stabilize the placed fill (access road/trail and earthen pad) on existing ground and reduce the sliding between the two surfaces.

The installation of the geotextile fabric is necessary in order to limit ground disturbance on any environmentally sensitive areas (ESA).

For the dirt access road from Moorpark Road to the earthen pad, the geotextile fabric will be placed over the area to be protected. On top of the geotextile fabric, a layer of a 2-inch minimum (post-compaction) decomposed granite mixed with minimum five percent cement will be laid down as sterile protection. This process is considered an industry standard, creating a sterile fill cap to protect ESAs that would otherwise be exposed and potentially impacted during construction.

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To: ENERGY DIVISION
Prepared by: Saeed Sadeghi
Title: Project Engineer
Dated: 01/06/2011

Question 05:

Questions regarding the implementation of APMs CUL-2, CUL-3, and CUL-4: site capping at CA-VEN-744

How deep will the soil cap on the access roads be?

Response to Question 05:

The following response is provided based on preliminary engineering conducted thus far by SCE:

The depth of the soil cap would be a minimum of two inches.

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Question 06:

Questions regarding the implementation of APMs CUL-2, CUL-3, and CUL-4: site capping at CA-VEN-744

How much vehicle traffic is anticipated on the capped access roads, both during and after project construction? Will the soil cap on the access road be appropriate to handle the long-term effects of vehicle traffic without erosion or compaction?

Response to Question 06:

The following response is provided based on preliminary engineering conducted thus far by SCE:

General information regarding vehicle traffic during the construction of the subtransmission components of the Presidential Substation Project can be derived from the following sections of SCE's response to CPUC Data Request ED-04, Question 1 (Atch-1 -Presidential Design Update_Redline of PEA Chapter 3) provided to the CPUC and ESA on July 30, 2010:

- Tubular Steel Pole Installation,
- Removal of Existing Poles, and
- Table 3.3. Construction Equipment Use Estimations, 66 kV Subtransmission Source Line Construction.

Construction of the proposed TSP and removal of the existing TSP is estimated to occur within an approximately two to four week period at the CA-VEN-744 location.

After project construction, the capped access road would primarily be utilized for routine patrols and maintenance of the existing 66 kV lines in the corridor, patrols of the 66 kV lines anytime there is a circuit relay, and to utilize and maintain the pole switch on the proposed TSP to sectionalize the line for maintenance activities. There are existing distribution lines within the vicinity of CA-VEN-744 which could require the use of the capped access road for general maintenance of the lines and to patrol the lines during outages.

The geotextile fabric and decomposed granite mixed with minimum five percent cement constitute part of the soil cap and provides soil to soil friction which prevents erosion by

reducing the velocity of storm runoff on the access road. The long term effects of vehicle traffic will contribute to the stability of the soil cap and some additional compaction of the road. However, based on the nature of archaeological site CA-VEN-744 and the results of the testing there is no evidence to suggest that cultural resources will be negatively affected by this compaction.

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Question 07:

Questions regarding the implementation of APMs CUL-2, CUL-3, and CUL-4: site capping at CA-VEN-744

Is there a plan for long-term monitoring of the site, in order to ensure that the geotextile and soil cap have remained stable and that there have been no adverse to the site over time?

Response to Question 07:

Long term monitoring of the site will be addressed as part of the Cultural Resources Treatment Plan (CRTP) discussed under APM-CUL-1. The capping of the site is intended to last for up to 10 years without any additional modifications. Capping will be checked six months after construction and then yearly for the first three years to ensure that materials are still intact. The long term condition of the capping will be assessed after the third year.