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CALIFORNIA ENERGY COMMISSION

CALIFORNIA NATURAL RESOURCES AGENCY

June 23, 2025

GIC Vernon, LLC
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, California 95608

Data Requests Set 1 for Vernon Backup Generating Facility (25-SPPE-01)

Dear Scott A. Galati:

Pursuant to California Code of Regulations, title 14, section 15084(b) and title 20, section 1941, the California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 1, which is necessary for a complete staff analysis of the Vernon Backup Generating Facility (VBGF) and associated Goodman Energy Park Data Center (GEP), under the California Environmental Quality Act (CEQA).

This Data Requests Set 1 seeks further information in the areas of Air Quality and Public Health, Greenhouse Gas Emissions, Biological Resources, Cultural and Tribal Cultural Resources, Executive Summary, Geology, Paleontology, Minerals, Noise, Population and Housing, Project Description, Transportation, and Utilities and Service Systems, based on the contents of the application submitted thus far. CEC staff is making a concerted effort to capture all outstanding data needs in one comprehensive set of data requests. Additional subsequent sets of data requests are a possibility if a determination is made following review of responses to Set 1 that staff still needs additional data to perform a complete analysis of the project. To assist CEC staff in timely completing its environmental review and to meet the requirements of CEQA (see Cal. Code Regs., tit. 14, §§ 15108, 15109), CEC staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need additional time, please send written notice to me within 10 days of receipt of this letter. If you have any questions, please email me at eric.veerkamp@energy.ca.gov.

/S/
Eric Veerkamp
Project Manager

Enclosure: Data Requests Set 1

AIR QUALITY AND PUBLIC HEALTH

Authors: Brewster Birdsall, Rachael Dal Porto

BACKGROUND: Air Quality Management District Application

The proposed project would require a permit from the South Coast Air Quality Management District (SCAQMD). For purposes of inter-agency consistency, staff needs copies of all correspondence between the applicant and the SCAQMD in a timely manner to stay up to date on any issues that arise prior to completion of the environmental document.

DATA REQUESTS

DR AQ-1. Please provide copies of all substantive correspondence between the applicant and SCAQMD regarding the project, including application and e-mails, within one week of submittal or receipt. This request is in effect until staff publishes the environmental document.

DR AQ-2. Please identify the current schedule for the SCAQMD permit application submittal. Please submit a copy of that application to the docket when it is submitted to SCAQMD.

BACKGROUND: CalEEMod Construction and Operation Emission Calculations

The SPPE Application Appendix B (TN 262032), Air Quality, Public Health and GHG Technical Report, sub-Appendix AQ4, Construction Emissions and Support Data, is used to document CalEEMod emissions calculations. The analysis uses a prior version of CalEEMod (2020) that does not include EMFAC2021 emission factors. Staff needs the input and output files of the CalEEMod emissions calculations to complete the review.

DATA REQUESTS

DR AQ-3. Please provide the input and output files of the CalEEMod emissions calculations.

DR AQ-4. Please re-run the CalEEMod analysis with the 2022 CalEEMod version.

BACKGROUND: Enforceable Permit Conditions, Annual Operations

Emissions estimates assume no more than 50 hours per year per engine for testing overall. Air quality impact modeling also presumes that readiness testing would be limited to occur within certain hours of the day (between the hours of 7

AM and 5 PM). Short-term impacts are shown on page 4.3-20, Table 4.3-11 of the SPPE Application emissions from one hour of testing of eight engines in one day. These daily emission rates would exceed the 55 lb/day SCAQMD NOx significance threshold. To remain below the 55 lb/day NOx threshold, testing could be limited to no more than four of the large QSK78 engines for no more than one hour per day.

The SPPE application shows certain assumptions for air quality impact analysis of the typical readiness and maintenance testing emissions that need to be verified. Assumptions in the analysis appear to include having no more than eight generators tested in a day, with no generator-engines tested concurrently. The modeling also assumes that the engine warmup time is 10 minutes (pages 4 and 5 of Appendix AQ1).

DATA REQUESTS

DR AQ-5. Please confirm that the applicant would request the SCAQMD to require an enforceable limit on concurrent testing of engines so that only a single engine operates for maintenance and testing at any given time, with a limit of four engines per day. If it is not feasible for the applicant to limit readiness testing to no more than four engines, for one hour or less, per day, please elaborate on why this would be infeasible, and what measures would be applied to keep daily NOx emissions below 55lb/day.

DR AQ-6. Please confirm that the applicant would request the SCAQMD to require an enforceable limit that would allow testing of standby engines only between the hours of 7 AM to 5 PM daily.

BACKGROUND: Screening for Low-load Conditions and Warm-up Period

In the SPPE Application, the applicant states "The engines could be operated over a range of load conditions from one (1) to 100 percent. Based on similar projects, the 100% load case always produces the maximum ground-based concentrations. Thus, an air quality screening analysis was not performed." The application also states, "The Applicant is not proposing a test schedule, i.e., hours versus load points but generally plans to test each generator one at a time. Testing will be done based upon the Applicants judgment, taking into account the manufacturers recommendations, staff availability, and need. Maintenance and readiness testing may occur at loads ranging from 25 to 100% load. For purposes of this application, emissions were assumed to occur at 100% load." However, in past projects, modelling has shown higher modeled operational concentrations at lower loads (75%, 50%, and 25%) for both PM10 and PM2.5. Staff needs to verify whether the Health Risk Assessment (HRA)

results for these lower load cases exceed those for the 100% load case. Staff also needs to ensure that the health risks of the project during lower load cases would not exceed the SCAQMD Significance Thresholds.

The SPPE Application (TN 262029, p. 4.3-20) indicates that testing of the engines can occur over a range of load conditions. However, the analysis says that "an air quality screening analysis was not performed," and "…the worst-case stack condition and the worst-case engine location could be determined from the screening analysis" (TN 262029, p. 4.3-30). Staff needs a detailed description of the types of testing and maintenance scenarios, the frequency of full-load tests and low-load tests, and confirmation of impacts at various standby engine load points to verify the assumptions used in the SPPE analysis.

The applicant assumed that the 100 percent load case would produce the maximum ground-based concentrations (TN 262029, p. 4.3-30). In calculating the nitrogen oxides (NOx) emissions for the 100 percent load case, the applicant assumed a warm-up period of 10 minutes. For lower load cases (e.g., 100, 75, 50, 25, and 10 percent load), it may take more time for the selective catalytic reduction (SCR) to warm up. Staff needs to confirm whether the NOx emissions during lower load cases would be lower than those estimated for the 100 percent load case. If a Tier 4 emission factor is assumed for part of the hour for these load cases, the applicant needs to provide documents/certificates from the SCR vendor to verify the warm-up period of the SCR to reach Tier 4 emission rates for these load cases.

In addition, lower exhaust temperatures and slower exhaust velocities at lower loads could result in higher ground-level concentrations, even if the mass emissions would be lower. Without modeling, staff would not be able to confirm whether the ground-level impacts for the lower load cases would be lower than those for the 100 percent load case.

DATA REQUESTS

DR AQ-7. Please provide emission calculations for the uncontrolled and controlled load-specific emission rates covering the range of low-load points (i.e., 75, 50, 25, and 10 percent load).

DR AQ-8. Please provide NOx emission calculations for the representative range of engine load points (e.g., 100, 75, 50, 25, and 10 percent load). If a Tier 4 emission rate is assumed for part of the hour for these load cases, please provide documents/certificates from the vendor to verify the warm-up period of the SCR to reach Tier 4 emission rates for these load cases.

DR AQ-9. Please provide a screening review of short-term (1-hour) ambient air quality impacts during testing for a representative range of engine load points (e.g., 100, 75, 50, 25, and 10 percent load) to confirm that full-load testing would produce the highest ground-level concentrations.

DR AQ-10. Please provide vendor documentation supporting SCR + DPF control effectiveness assumptions in achieving the Tier 4 emissions standards.

DR AQ-11. Please elaborate on whether the engines could potentially be tested from a cold start to full load (100%) during any hour, and if not, please explain what steps could be taken by the owner/operator to avoid this type of full load test.

BACKGROUND: Ammonia Emissions

With the use of SCR to control oxides of nitrogen (NOx) emissions from the proposed engines, unreacted ammonia would also be emitted. Staff needs the ammonia emissions estimate to complete the analysis.

DATA REQUEST

DR AQ-12. Please disclose and quantify the potential ammonia emission rates and anticipated levels of ammonia slip during operation of the proposed backup generators.

BACKGROUND: Dispersion Modeling Details and Electronic Files

Staff needs the electronic versions of emissions estimating spreadsheets and model input/output files to fully review the analysis.

The SPPE Application, Appendix B, includes drawings of side elevations for engine enclosures showing "plenum extensions" (TN 262032, PDF pp.32-33), and these appear to indicate options for different engine stack heights. Staff needs to understand the different release parameters assumed for each of the proposed engines.

DATA REQUESTS

DR AQ-13. Please provide the output files for the health risk assessment (HRA) results that feed into Table 4.3-21 of the SPPE Application.

DR AQ-14. Please provide the electronic files for the dispersion modeling and HRA.

DR AQ-15. Please clarify stack parameters (e.g., stack height, exit temperature, stack diameter, and stack exit velocity) used in the HRA, and please confirm these are the final parameters that will be actualized in operation.

DR AQ-16. Please provide PM2.5 and PM10 concentrations at all receptors.

GREENHOUSE GAS EMISSIONS

Authors: Brewster Birdsall, Rachael Dal Porto

BACKGROUND: Consistency with GHG Reduction Strategy

The SPPE Application Part I (TN 262029) includes discussion of consistency with some of the GHG reduction measures. However, the application does not demonstrate consistency with the following control measures from City of Vernon General Plan.

GP Policy R-1.2: Support the use of energy-saving designs and equipment in all new development and reconstruction projects.

GP Policy R-2.1: Coordinate and cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in efforts to implement the regional Air Quality Management Plan.

GP Policy R-2.2: Encourage and facilitate the use of public transportation to reduce emissions associated with automobile use.

Staff needs to know whether the project would implement these General Plan control measures.

DATA REQUEST

DR GHG-1 Please provide discussion of project features to ensure implementation for each component of the control measures/policies mentioned above.

BIOLOGICAL RESOURCES

Author: Alex Single

BACKGROUND: Nitrogen Deposition Modeling

The Biological Resources section of the SPPE Application (TN 263302) did not include a discussion of nitrogen deposition impacts for the project's 40 diesel-fired backup generators. For siting projects, staff evaluates nitrogen deposition impacts by considering protected areas within a 6-mile radius of a project site.

These protected areas include California Department of Fish and Wildlife sensitive natural communities and U.S. Fish and Wildlife designated critical habitat. CEC staff has found that by the time the plume has traveled this distance, in-plume concentrations become indistinguishable from background concentrations. See California Code of Regulations, Title 20, Division 2, Chapter 5, Appendix B (g) (13) (B) (ii), Appendix B (g) (13) (C) (ii), Appendix B (g) (E), and Appendix B (g) (15) (B) (ii).

DATA REQUEST

DR BIO-1. Please perform nitrogen deposition modeling for the 40 diesel-fired backup generators (backup generators). The modeling should specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) for wet and dry deposition in special status species habitats and vegetation types. Please describe each habitat and species potentially affected by nitrogen deposition. Include the complete citation for references used (including the source document for documents not readily available online) in determining deposition rates and location. Provide modeled nitrogen deposition rates, map(s), and other information as specified for the project's backup generators. The response should also include a discussion of the potential for all anticipated emissions that may adversely affect soil-vegetation systems.

Alternatively, please provide justification regarding why the modeling is not warranted, which may include absence of designated critical habitat or sensitive natural communities with nitrogen-sensitive vegetation types within the 6-mile area potentially affected by the modeled nitrogen deposition plume.

BACKGROUND: Biological Resources Technical Report (BRTR)

Staff reviewed the BRTR included in Appendix C (TN 263302) and determined that revisions and additional information consistent with requirements in Appendix B are needed where indicated in the data requests below.

DATA REQUESTS

DR BIO-2. Per Appendix B (g) (13) (D), please provide the name(s) and qualifications of the biologists who conducted the survey referenced in the BRTR.

DR BIO-3. Per Appendix B (g) (13) (D), please provide copies of field survey forms completed by the applicant's biologist(s).

DR BIO-4. Please provide GIS data (shape and/or geodatabase files) for all data mapped for biological resources.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Authors: William Larson, Cameron Travis

BACKGROUND: Updated Record Search Needed

The applicant's records search only covered 0.5 mile surrounding the project site, except due south and due east. The buffer employed for the proposed transmission lines comports with the requirements of Appendix B (g) (2) (B).

DATA REQUEST

DR CUL-1. Per Appendix B (g) (2) (B), please submit updated records search results extending to 1.0 mile for the area surrounding the project site to the southwest, west, northwest, north, and northeast.

BACKGROUND: Copies of DPRs and Reports Needed

The applicant did not provide copies of California Department of Parks and Recreation (DPR) 523 forms or reports from the record search results.

DATA REQUESTS

DR CUL-2. Please provide copies of DPR 523 forms for all cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search and updated literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, per Appendix B (g) (2) (B).

DR CUL-3. Please provide copies of all technical reports whose survey coverage is wholly or partly within 0.25 mile of the area surveyed for the project or which report on any archaeological excavations or architectural surveys within the literature search area per Appendix B (g) (2) (B). At minimum, these studies shall include LA-3268, LA-3408, LA-4834, LA-6357, LA-7842, LA-9113, LA-10593, and LA-12987.

BACKGROUND: Survey Coverage Archaeology

The inventory report (Chronicle 2025) did not indicate if the archaeological survey included a 200-foot buffer from the project site or a 50-foot buffer from the proposed transmission line routes.

DATA REQUEST

DR CUL-4. Please acknowledge whether the archaeological survey included a

200-foot buffer from the project site, a 50-foot buffer from the proposed transmission line routes, or provide a reason why a buffer could not reasonably be surveyed per Appendix B (g) (2) (C).

BACKGROUND: Survey Coverage Built Environment

The cultural technical report did not indicate if the survey included all buildings 45 years and older within one parcel of the project site and any project linear elements. Buildings 45 years and older within one parcel must be recorded and evaluated for significance on DPR 523 forms, per Appendix B (g) (2) (C). The cultural technical report identifies 11 properties that were recorded and evaluated, but Table 6-1, Historic Period Properties Description and CRHR Evaluation, includes a large number of properties within and along the area of the project with buildings 45 years old or older that were not recorded and evaluated for significance. The report states, "Only properties that were determined to retain integrity were recorded and evaluated as part of this investigation"; however, integrity is specifically related to the characteristics necessary to convey the significance of a cultural resource. Without evaluating the resource, integrity cannot be determined.

Several of the buildings listed in Table 6.1 have been demolished; these do not need to be recorded and evaluated. If any of these buildings are determined to be part of the Vernon Historic District, then they may be recorded as part of the district and do not require a separate standalone evaluation.

DR CUL-5. Please provide evaluations of all buildings 45 years and older within one parcel of the project and its linear elements on DPR 523 forms.

BACKGROUND: Missing References

The survey report's References Cited section is missing several references from the body of the report.

DATA REQUEST

DR CUL-6. Please check all references in the body of the report and ensure they are included in the References Cited section of the report. Please add: Masters 2014, The City of Vernon 2012, Nials et al. 2013, Bright 1977, Reid 1926, Augustine Band of Cahuilla Indians; Ricardo Lopez 2019, and OHP 1990. In addition, please add the references from the CRHR Evaluation section to the References Cited.

BACKGROUND: More Focused Prehistoric Context

Although the prehistoric context mentions Los Angeles County a few times,

almost all of the references cited in the section focus on areas outside of Los Angeles County with most information focused on San Diego, the coast, and the Mojave Desert.

DATA REQUEST

DR CUL-7. Per Appendix B (g) (2) (A), please add to the prehistoric context an emphasis on the area no further than 5 miles of the project location citing relevant sources for information within the area in question. Consider the Alameda Corridor archaeological documents from the records search as you incorporate information of greater relevance to the project site.

BACKGROUND: More Focused Ethnohistoric Context

The report does include the relevant tribes for the region (Gabrielino, Cahuilla, and Luiseno), however, the project area itself is located within the Gabrielino ancestral territory and is missing some key ethnographic information pertaining to the Gabrielino such as the Kroeber-documented village or community of Apachia, which is just to the northeast of Vernon.

DATA REQUEST

DR CUL-8. Please add a more in depth Ethnohistoric Context for the Gabrielino and include an emphasis on the area within a 5-mile radius of the project location per Appendix B (g) (2) (A).

REFERENCE

Chronicle 2025 – Chronicle Heritage. *Cultural Resources Assessment for the Goodman Energy Park Data Center in City of Vernon, Los Angeles County, California.* Confidential report prepared for DayZen, LLC, Carmichael, CA. May 2025.

EXECUTIVE SUMMARY

Author: Eric Veerkamp

BACKGROUND: Executive Summary, Site Exhibits

To thoroughly illustrate and present the project site and surroundings, staff needs several maps depicting current conditions.

DATA REQUEST

DR EXEC SUMM-1. To supplement the current Figure 1 (vicinity map) in the project application materials at Appendix A, Part I of II (TN 262031), please

provide a map depicting the regional setting (1" = 2,000'), and a map of the project site (site plan) and its immediate surroundings (1" = 500'). The three exhibits together would comprehensively illustrate for staff the parcel and its place in the regional surroundings.

BACKGROUND: Executive Summary, Photographic Reproductions

To thoroughly depict and present the project site and surroundings, staff needs several illustrations depicting current conditions.

DATA REQUEST

DR EXEC SUMM-2. To supplement the current sheets A05-01 and A05-02 in Appendix A, Part I of II (TN 262031), of the project application materials consisting of colored artist exterior elevation renderings of the finished project, staff also requests a colored reproduction drawing of the site prior to construction.

BACKGROUND: Executive Summary, Project Parcel Identification Information

For proper identification of the parcel(s) for siting of the proposed project, staff requires precise location information, partly for other agencies tracking and identification systems.

DATA REQUEST

DR EXEC SUMM-3. Please provide identification information for all involved project parcels by section, township, range, and county, as well as assessor's parcel number.

BACKGROUND: Executive Summary, Property Owner's Mailing List, Map

Staff needs a map of parcels to accompany the list of parcel numbers, the map shall be for parcels within 1,000 feet of the site proper and parcels within 500 feet of linear project components (T-Line, water line, gas line, etc.). For parcels contiguous to the project site and linear features, direct mailing addresses for owners and occupants shall be provided.

DATA REQUEST

DR EXEC SUMM-4. The project application materials in Appendix I "Notice List" (TN 262058), needs to be supplemented with a map of parcels identified in the table of addresses/ parcels.

BACKGROUND: Executive Summary, Construction Schedule

Staff needs details of construction schedules for workload staffing, peaks, maximum number of workers, time of year, etc. The application indicates a full construction schedule is provided in Section 2.3.9; however, Section 2.3.9 is "Right of Way Improvements at Project Frontage" (TN 262029).

DATA REQUEST

DR EXEC SUMM-5. Please provide a comprehensive construction schedule and construction/operation narrative.

BACKGROUND: Executive Summary, Ownership

Staff needs ownership information to know who will be operating and have responsibility for the project generating facility and the transmission line.

DATA REQUEST

DR EXEC SUMM-6. Please provide a list of all owners and operators and their legal relationships for the proposed owners of the power plant facilities and the transmission lines.

BACKGROUND: Executive Summary, Responsible Agencies

Staff needs to make provision to allow responsible agencies the ability to utilize a final exemption document.

DATA REQUEST

DR EXEC SUMM-7. Please provide a table that identifies each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified LORS, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, should the Commission exempt the facility from its exclusive authority to certify sites and related facilities. If no agencies with relevant jurisdictions exist, please state so.

GEOLOGY

Author: Kevin DeLano

BACKGROUND: Section 4.7 Geology and Soils of the main SPPE Application (TN 262029) contains footnote citations. However, a list of references for sources cited in these sections was not provided.

DATA REQUEST

DR GEO-1. Please provide a list of all literature relied upon or referenced in Section 4.7 Geology and Soils, related to geology and soils.

BACKGROUND: Subsection 4.7.2.1 Regulatory Framework includes descriptions of state laws, ordinances, regulations, and standards (LORS) related to geology and soils. However, descriptions of relevant regional and local LORS are required and not provided. Tables of agencies with permitting, leasing, and approval jurisdictions are required and not provided.

DATA REQUESTS

DR GEO-2. Please provide a discussion of relevant regional and local LORS related to geology and soils and are applicable to the proposed project. For example, please add relevant portions of municipal codes and general plans from the County of Los Angeles and City of Vernon.

DR GEO-3. Please provide a table that lists LORS, adopted local, regional, state, and federal land use plans, leases, and permits that are related to geology and soils and applicable to the proposed project.

BACKGROUND: Additional information is required in subsection 4.7.2.2 Existing Conditions and Appendix 4-4A_Geotechncial Evaluation Part 1 to evaluate existing geologic conditions at the site and within two miles of the site.

DATA REQUESTS

DR GEO-4. Please expand the spatial extent of Figure 5 in Appendix 4-4A_Geotechncial Evaluation Part 1 to show recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project.

DR GEO-5. Please add a description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project to Section 4.7 Geology and Soils.

BACKGROUND: As described in Appendix 4-4A_Geotechncial Evaluation Part 1, sediments that are potentially liquefiable, if saturated, underlay the project site. Figure 7 of that report shows the project is less than one mile from a CGS identified Liquefaction seismic hazard zone. Additional information is needed in subsection 4.7.2.2 Existing Conditions to evaluate existing geologic conditions at the project site.

DATA REQUEST

DR GEO-6. For the liquefaction potential analysis, a 1998 report (California Department of Conservation, Division of Mines and Geology, Seismic Hazard Report for the Los Angeles and South Gate 7.5 Minute Quadrangle, Los Angeles County, California, Plate 1.2 (SHZR 29 & 34) was used to estimate the historical high groundwater elevation. Please search more recent publicly available groundwater elevation sources to verify or revise the historical high groundwater elevation at the proposed project site.

BACKGROUND: Additional information is required in subsection 4.7.5 Government Agencies.

DR GEO-7. If applicable, please provide the name, title, phone number, address (required), and email address (if known), of the staff at the County of Los Angeles who will serve as a contact person for CEC staff on issues related to geology and soils.

PALEONTOLOGY

Author: Kevin DeLano

BACKGROUND: Section 4.7 Geology and Soils of the main SPPE Application (TN 262029) contains footnote citations. However, a list of references for sources cited in these sections was not provided.

DR PALEO-1. Please provide a list of all literature relied upon or referenced in Section 4.7 Geology and Soils, related to paleontological resources.

BACKGROUND: Subsection 4.7.2.1 Regulatory Framework includes descriptions of state laws, ordinances, regulations, and standards (LORS) related to paleontological resources. However, descriptions of relevant regional and local LORS are required and not provided. Tables of agencies with permitting, leasing, and approval jurisdictions are required and not provided.

DR PALEO-2. Please provide a discussion of relevant regional and local LORS related to paleontological resources. For example, please add relevant portions of municipal codes and general plans from the County of Los Angeles and City of Vernon.

DR PALEO-3. Please provide a table that lists LORS, adopted local, regional, state, and federal land use plans, leases, and permits that are related to paleontological resources and applicable to the proposed project.

DR PALEO-4. Please provide a table that identifies each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified LORS, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, should the Commission exempt the facility from its exclusive authority to certify sites and related facilities. If no agencies with relevant jurisdictions exist, please state so.

BACKGROUND: Additional information is required in subsection 4.7.2.2 Existing Conditions to evaluate paleontological resources at the project site.

DR PALEO-5. Please provide a discussion of the paleontological sensitivity of each geologic unit within two (2) miles of the project, as identified on the revised Figure 5 requested in **DR GEO-5**. Please provide rationale as to why each sensitivity was assigned.

BACKGROUND: In subsection 4.7.2.2 Existing Conditions, the application states a records search did not return any paleontological resource sites in the City of Vernon. Staff notes that parts of the City of Vernon's northern and southern borders are less than one (1) mile from the project.

DR PALEO-6. Please clarify if the records search returned any paleontological sites within one (1) mile of the project site.

DR PALEO-7. If applicable, please provide the name, title, phone number, address (required), and email address (if known), of the staff at the County of Los Angeles who will serve as a contact person for CEC staff on issues related to paleontological resources.

MINERALS

Author: Kevin DeLano

BACKGROUND: Section 4.12 Mineral Resources of the main SPPE Application (TN 262029) contains footnote citations. However, a list of references for sources cited in these sections was not provided.

DR MINERALS-1. Please provide a list of all literature relied upon or referenced in and Section 4.12 Mineral Resources.

BACKGROUND: Subsection 4.12.2.1 Regulatory Framework includes descriptions of state laws, ordinances, regulations, and standards (LORS) related to mineral resources. However, descriptions of relevant regional and local LORS are required and not provided.

DR MINERALS-2. Please provide a discussion of relevant regional and local LORS related to mineral resources. Specifically, please add relevant portions of municipal codes and general plans from the County of Los Angeles and City of Vernon.

HAZARDS AND HAZARDOUS MATERIALS

Author: Sandy Ito

BACKGROUND: Location, Volume, and Refilling of the DEF Tanks

Section 2.2.10, Hazardous Materials Management, of the main SPPE Application (TN 262029) states that, "Diesel Exhaust Fluid (DEF) is used as part of the diesel engine combustion process to treat the exhaust gas and meet the emissions requirements. Each enclosure will have a 100-gallon DEF tank."

DATA REQUESTS

DR HAZ-1. Please provide an estimate of how often these tanks would need to be refilled during operation of the generators as well as the total volume of DEF to be stored on site.

DR HAZ-2. Please provide a discussion of the safety measures (including secondary containment) that would be undertaken to prevent spills or leaks during the filling of the DEF tanks during commissioning and operation of the project.

BACKGROUND: CUPA Contact Information

Section 4.9.5, Governmental Agencies, states that, "The City of Vernon [Department of Health and Environmental Control (DEHC)] is the agency responsible for regulating potential hazards discussed above under its Comprehensive Unified Agency Program (CUPA) status."

DATA REQUEST

DR HAZ-3. Please provide contact information (name, title, phone number, address, and email address) for an official who was contacted or can be a point of contact for CEC staff.

HYDROLOGY AND WATER QUALITY

Authors: Nick Kehrlein and James Ackerman, PG

BACKGROUND: Identifying Discharge Impacts Due to Construction and Operation

SPPE Application (TN 262029) section 4.10.3.3 states that "post-project flows will not exceed pre-project flows" because stormwater shall be treated using an underground stormwater biofiltration system but also proposes a significant increase in impermeable land surface.

DATA REQUESTS

DR HYD-1. Quantify the change in impermeable surface due to the project construction and operation.

DR HYD-2. Quantify the change in runoff due to project construction and operation and explain how it would be managed such that it would not exceed pre-project flow rates given the significant increase in impermeable areas.

NOISE

Author: Ardalan Sofi

BACKGROUND: Estimated Project Noise Levels

In Section 4.13.3.1 of the SPPE Application (TN 262029), the applicant provides predicted noise levels from the operation of HVAC equipment (Table 4.13-6) and from the simultaneous operation of 19 backup generators (Table 4.13-7). However, the SPPE does not evaluate the testing scenario in which all HVAC equipment operates concurrently with the testing of a single backup generator (tested one at a time).

DATA REQUEST

DR NOISE-1. Please provide the operational noise contour maps (in units of L_{eq}) for the following two modes:

- normal mode, which assumes normal operating conditions, including operation of all HVAC equipment, without any of the gensets operating, and
- testing mode, which assumes testing one genset concurrently with the operation of all HVAC equipment at full load. For this mode, please consider testing of the genset that would result in the highest noise level at any receptor.

DR NOISE-2. Please provide a noise contour map (in units of L_{eq}) representing the aggregate construction noise levels during the loudest construction phase at any receptor.

DR NOISE-3. Please provide a map showing the exact receptor locations corresponding to the predicted operational noise levels in each of the four directions for each of the operational modes (HVAC operation, generator operation, and testing mode).

DR NOISE-4. Please provide a map showing the receptor points used for predicted construction noise levels at 50 feet and 200 feet from the source.

BACKGROUND: Clarification On Analysis/Methodology

In Section 4.13.2.2 of the SPPE Application (TN 262029), the applicant provides only a range of ambient noise levels without hourly resolution, and it is unclear whether the reported values are in dB or A-weighted dB (dBA).

Additionally, the applicant uses the City of Vernon Municipal Code as the threshold of significance for operational noise impacts, without providing justification for selecting it over the City of Vernon General Plan noise policies.

DATA REQUEST

DR NOISE-5. Please provide hourly average ambient noise levels in both L_{eq} and L_{50} in dBA at each monitoring location.

DR NOISE-6. Please explain the basis for using the City of Vernon Municipal Code as the noise threshold for assessing operational impacts, and clarify why the City of Vernon General Plan standards were not used instead.

DR NOISE-7. Please confirm whether the reported ambient and predicted project noise levels are presented in A-weighted decibels (dBA). If not, please provide revised values in dBA.

POPULATION AND HOUSING

Author: Ellen LeFevre

BACKGROUND: Project Operation

Staff needs to verify the number of expected daily visitors during project operation.

The Project Description Section 2.3.2 page 2-15 (TN Section 2.3.2) states there would be "up to 30 visitors (including deliveries)" per day during operation. The Population and Housing section page 4.14-6 states “up to 50 visitors (including deliveries)” per day during operation.

DATA REQUEST

DR POP HOUSING-1. How many daily visitors are expected during project operation?

PROJECT DESCRIPTION

Author: Laiping Ng

BACKGROUND: Project Description

The GEP Vernon Backup Generating Facility (VBGF) includes an onsite substation and a switching station with two 66 kilovolt (kV) electrical supply lines that would connect to existing Vernon Public Utilities (VPU) Leonis Substation. Staff requires a complete description of both the VBGF interconnection to the VPU transmission grid and the reliability of the VPU grid to understand the potential operation of the back-up generators.

DATA REQUESTS

DR PROJECT DESCRIP-1. Please provide the conductor name, type, current carrying capacity, length, and the overhead conductor size for the two 66 kV transmission lines which connect the existing VPU Leonis Substation to the new project switchyard.

DR PROJECT DESCRIP-2. Please provide pole type, height, and configurations that would support the 66 kV overhead line which would loop into the new switchyard and to the on-site substation. Provide a map showing pole locations of the extensions.

DR PROJECT DESCRIP-3. Please provide information that reviews the frequency and duration of historic outages of the Leonis Substation and related facilities that would likely trigger the loss of electric service to the proposed onsite substation and could lead to the emergency operations of the diesel-powered generators. This response should identify the reliability of service historically provided by VPU to similar customers in this part of its service territory.

DR PROJECT DESCRIP-4. Please explain whether adding the VBGF would cause any overloads to the VPU transmission system which would require upgrades to the existing transmission or distribution networks.

DR PROJECT DESCRIP-5. Does VPU have a public safety power shutoff program (PSPS)? Would neighboring utilities' power shutoff programs impact the VPU system? Please provide the following regarding power shutoff events:

a. Would historical power shutoff events have resulted in the operation of the emergency generators at the proposed VBGF?

b. Have there been changes to the VPU system around the VBGF that would affect the likelihood that future power shutoff events would result in the operation of emergency generators at the proposed VBGF campus?

TRANSPORTATION

Author: Steven J Brown, PE (Fehr & Peers)

BACKGROUND: The application requirements for Small Power Plant Exemptions include standard items to be provided by the applicant. The missing items related to Traffic and Transportation are identified below.

DATA REQUEST

DR TRANS-1:

- Provide a map of the transportation-related facilities in the area at 1:250,000 scale.
- Reference all relevant policies/standards in local and regional plans.
- Identify whether the project is within four miles of an airport. If yes, then provide additional details specified in the requirements.
- For roadways in the area, identify their classification, current and future traffic volumes (absent the project), weight limitations, and any sub-standard features related to safety.

BACKGROUND: Trip Generation Calculations

The SPPE Application (TN 262058) transportation analysis (Kimley-Horn, 2/10/25 memo) identifies that 85 people would come to the site on a typical day, which is comprised of 35 employees and 50 visitors.

DATA REQUESTS

DR TRANS-2. Please confirm whether the "visitors" includes deliveries.

DR TRANS-3. If the site would have 85 people come to the site each day, then how can the daily trip generation be 109-117 trips as specified on Page 3?

Assuming the employees drive alone, and they make one extra trip during the day (lunch, errands, etc.), and the employees and visitors have an average vehicle occupancy (AVO) of 1.5 persons per vehicle, this would equate to 160 vehicles trips per day. Please explain the conclusion of 109-117 daily trips and corresponding exemption for vehicle miles travelled (VMT) (110 trips maximum).

DR TRANS-4. Given the above information suggests that the daily trips would be above the 110-trip threshold for VMT exemption, please provide the VMT analysis.

BACKGROUND: Construction Traffic

For a project like a data center, construction traffic can be a significant factor, including the air quality and noise aspects. Moreover, CEQA Guidelines identify the need to address construction traffic.

DATA REQUEST

DR TRANS-5. Please provide information regarding construction trips. Namely, what are the expected number of daily truck trips, duration of construction, and origin/destination of construction trips?

UTILITIES AND SERVICE SYSTEMS

Author: James Ackerman

BACKGROUND: Correct Description of Storm Drainage

Section 4.18.2.2, "Storm Drainage" subsection of the SPPE Application (TN 262029) makes references to the "Delta" (Sacramento-San Joaquin Delta?), Contra Costa County, the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), and Golf Club Road. Based on this information, it appears that this section was copied from another project application in Northern California.

DATA REQUEST

UTILITY-1. Please provide a description of storm drainage for the current project site in Vernon, California. Indicate if the storm drain system discharges into the Los Angeles River and if so, where the nearest discharge point is located.