

DOCKETED

Docket Number:	24-OPT-01
Project Title:	Perkins Renewable Energy Project
TN #:	264669
Document Title:	Second Determination of Incompleteness and Request for Information for the Perkins Renewable Energy Project
Description:	N/A
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Organization:	California Energy Commission
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Docketed Date:	7/11/2025



**CALIFORNIA
ENERGY COMMISSION**



July 11, 2025

IP Perkins, LLC
c/o Intersect Power, LLC
Attn: Camille Wasinger
9450 SW Gemini Drive PMB #68743
Beaverton, OR 97008

Second Determination of Incomplete Application and Request for Information for the Perkins Renewable Energy Project (24-OPT-01)

Dear Camille Wasinger,

On February 27, 2024, California Energy Commission (CEC) staff confirmed receipt of an Opt-In Application for the Perkins Renewable Energy Project (project) (24-OPT-01) by IP Perkins, LLC, IP Perkins BAAH, LLC, and related affiliates (collectively, applicant), subsidiaries of Intersect Power, LLC. The applicant proposes to construct, operate, maintain, and decommission an approximately 1,150-megawatt (MW) solar photovoltaic (PV) and battery energy storage system (BESS) on United States Bureau of Land Management and Bureau of Reclamation administered public lands (approximately 5,611 acres), and private lands (approximately 515 acres) in Imperial County east of El Centro, California.

The project would generate and store renewable electricity via arrays of solar PV panels, a BESS, and appurtenant facilities. The final project capacity would be based on optimization of buildable acreage and solar PV technology at the time of procurement. The project would construct a new generation interconnection line (gen-tie) that would connect the project substation to a new high-voltage breaker and a half switchyard. The gen-tie would be approximately 200 feet or 1.3 miles in length depending on the two optional locations of the substation. From the switchyard, two new 500 kilovolt (kV) loop-in transmission lines would be constructed to interconnect to the existing San Diego Gas & Electric Company (SDG&E) 500 kV Southwest Power Link Transmission Line that travels east-west just south of the project site.

CEC staff issued a Determination of Incomplete Application and Request for Information for the project on March 28, 2024 (TN 255316). On March 17, 2025, Panorama Environmental, Inc., the applicant's consultant, filed the final batch of data responses to staff's first set of data requests. Based on staff's subsequent review, applicant's responses remain incomplete.

Under Public Resources Code, section 25545.4(b), the CEC staff requests the information described in the attachments to this letter. The attachments consist of (1) data completeness worksheets listing the requirements specified in statute and regulations, and (2) requests for additional information needed for staff to complete its environmental analysis of the proposed project, which includes input from partner agencies who have a memorandum of understanding with the CEC to perform a related review for opt-in applications. The data requests fall within the topics of: Air Quality (includes Greenhouse Gases), Biological Resources, Cultural/Tribal Cultural Resources, Hazardous Materials Handling, Land Use, Public Health, Socioeconomics, Traffic and Transportation, and Worker Safety. CEC staff and the applicant have discussed the possible need for additional information concerning the topics of Mandatory Opt-In Requirements, Project Description, and Transmission System Design which, if needed, will be filed in a forthcoming data request.

All requested information is reasonably necessary to prepare an Environmental Impact Report as part of a CEC Staff Assessment and to support a decision on the application, including all the findings required in Chapter 6.2 of Division 15 of the Public Resources Code sections 25445 et seq.

CEC staff asks the applicant to file complete responses by technical area to the requested data in as few submittals as possible and provide an estimated timeline of when the remaining data will be submitted. CEC staff asks that upon submitting complete responses, the applicant provide a statement that its response to the request for information is complete and addresses all identified deficiencies.

Consistent with Public Resources Code, section 25545.4(c)(2) and California Code of Regulations, title 20, section 1878, upon receipt of all information responsive to this request, *accompanied by a statement from the Applicant that its response to this request for information is now complete and addresses all identified deficiencies*, CEC staff will finalize review of the information provided and document its determination regarding application completeness in a subsequent letter.

If you have any questions about the information identified as necessary to complete the application, please email Lisa Worrall, project manager, at lisa.worrall@energy.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Drew Bohan', with a stylized, sweeping underline.

Drew Bohan
Executive Director

Attachments

Attachment A: REV 1 Data Completeness Worksheets for Title 20, section 1877

Attachment B: REV 1 Data Requests

Perkins Renewable Energy Project (24-OPT-01)

Second Completeness Review

Incomplete

1. Mandatory Opt-In Requirements (not included, but may have follow up data requests)
2. Air Quality (includes Greenhouse Gases)
3. Biological Resources
4. Cultural/Tribal Cultural Resources
5. Hazardous Materials Handling
6. Land Use
7. Project Description (not included, but may have follow up data requests)
8. Public Health
9. Socioeconomics
10. Traffic and Transportation
11. Transmission System Design (not included, but may have follow up data requests)
12. Worker Safety

Complete

1. Alternatives
2. Efficiency, Energy, and Energy Resources
3. Facility Design
4. Executive Summary
5. Geological Hazards
6. Noise and Vibration
7. Paleontological Resources
8. Reliability
9. Soils
10. Transmission System Safety and Nuisance
11. Visual Resources
12. Waste Management
13. Water Resources
14. Wildfire

Attachment A

REV 1 Data Completeness Worksheets
for Title 20, section 1877

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: July 2025

Technical Area: Air Quality Project: Perkins Renewable Energy Project

Technical Staff: Wenjun Qian Huei-An (Ann) Chu/Yifan Ding

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

Technical Senior: Joseph Hughes-Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 4.1, Subsection 4.1.2, pp. 4.1-10 to 4.1-12; Appendix H.5, pp. 28 to 29	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.1, Subsection 4.1.1, pp. 4.1-3 to 4.1-10	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 4.1, Subsection 4.1.7, pp. 4.1-32 to 4.1-33; Appendix H.7, pp. 36 to 39	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any	Section 4.1, Subsection 4.1.3, pp. 4.1-26 to 4.1-27 Appendix B of Appendix H (254403), Subsection 2, pp. 133 to 140; Appendix C of Appendix H (254403), pp. 201 to 203;	No	See DR AQ-7 to DR AQ-10, DR GHG-1 to DR GHG-5 See REV 1 DR AQ-1, REV 1 DR AQ-2, REV 1 DR GHG-1 to REV 1 DR GHG-6

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: July 2025

Technical Area: Air Quality Project: Perkins Renewable Energy Project

Technical Staff: Wenjun Qian Huei-An (Ann) Chu/Yifan Ding
Andres Perez

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

Technical Senior: Joseph Hughes-Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Response Set #1 Part 1 (257953), Subsection 2.7, p. 21 of 320; Subsection 2.9, p. 21 of 320; Subsection 2.10, pp. 21 of 320 to 22 of 320; Subsection 3.1, p. 23 of 320; Subsection 3.2, p. 23 of 320; Subsection 3.3, p. 24 of 320; Subsection 3.4, p. 24 of 320; Subsection 3.5, pp. 24 of 320 to 25 of 320		
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	Section 4.1, Subsection 4.1.5, Table 4.1-13 Response Set #1 Part 1 (257953), Subsection 2.2, pp. 16 of 320 to 17 of 320	No	See DR AQ-1 and DR AQ-2 See REV 1 DR AQ-3
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	Section 4.1, Subsection 4.1.2, pp. 4.1-10 to 4.1-12 Response Set #1 Part 1 (257953), Subsection 2.3, p. 17 of 320	No Yes	See DR AQ-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: July 2025

Technical Area: Air Quality Project: Perkins Renewable Energy Project

Technical Staff: Wenjun Qian Huei-An (Ann) Chu/Yifan Ding
Andres Perez
Joseph Hughes-Wenjun Qian

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

Technical Senior: Qian

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Appendix I.1 Response Set #1 Part 1 (257953), Subsection 7.2, p. 38 of 320	No Yes	See DR-PD-2
Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	N/A	N/A	N/A
Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO2, CH4, N2O, and SF6) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.	Section 4.1, Subsection 4.1.2, Table 4.1-9, Table 4.1-10 Response Set #1 Part 1 (257953), Subsection 2.3, p. 17 of 320; Subsection 7.2, p. 38 of 320	No	See DR-AQ-3, DR-PD-2 See REV 1 DR GHG-4 to REV 1 DR GHG-6
Appendix B (g) (8) (F)(i)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	Section 4.1, Subsection 4.1.2, pp. 4.1-11 to 4.1-12 Response Set #1 Part 1 (257953), Subsection 3.6, p. 25 of 320; Subsection 3.7, p. 25 of 320	No	See DR-GHG-6, DR-GHG-7 See REV 1 DR GHG-5

DATA COMPLETENESS WORKSHEET

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Revision No. 01 Date: July 2025

Technical Area: Air Quality Project: Perkins Renewable Energy Project

Technical Staff: Wenjun Qian Huei-An (Ann) Chu/Yifan Ding

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

Technical Senior: Joseph Hughes-Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (F)(ii)	A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests.	N/A	N/A	N/A
Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.	Section 4.1, Subsection 4.1.1, Table 4.1-2, Table 4.1-3 <u>Response Set #1 Part 1 (257953), Subsection 2.4, pp. 17 of 320 to 18 of 320; Subsection 2.5, p. 18 of 320</u>	No <u>Yes</u>	See DR AQ-4, DR AQ-5
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological	Appendix H.2, p.8 <u>Response Set #1 Part 1 (257953), Subsection 2.6, pp. 18 of 320 to 19 of 320</u>	No <u>Yes</u>	See DR AQ-6

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Revision No. 01 Date: July 2025

Technical Area: Air Quality Project: Perkins Renewable Energy Project

Technical Staff: Wenjun Qian Huei-An (Ann) Chu/Yifan Ding
Andres Perez

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

Technical Senior: Joseph Hughes-Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	data approved by the California Air Resources Board or the local air pollution control district.			
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety.	Appendix H.2, p.8 <u>Response Set #1 Part 1 (257953), Subsection 2.6, pp. 18 of 320 to 19 of 320</u>	No <u>Yes</u>	See DR AQ-6
Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Appendix H.2, p.8 <u>Response Set #1 Part 1 (257953), Subsection 2.6, pp. 18 of 320 to 19 of 320</u>	No <u>Yes</u>	See DR AQ-6
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of:	--	--	--
Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the	Appendix H.6, pp. 30 to 32, Table 12	No	See DR AQ-7, DR AQ-8 <u>See REV 1 DR AQ-1 and REV 1 DR AQ-2</u>

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Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: July 2025

Technical Area: Air Quality Project: Perkins Renewable Energy Project

Technical Staff: Wenjun Qian Huei-An (Ann) Chu/Yifan Ding

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

Technical Senior: Joseph Hughes-Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM ₁₀) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO _x), sulfur dioxide (SO ₂), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM ₁₀) and particulate matter less than 2.5 microns in diameter (PM _{2.5}) from construction-related equipment;	Appendix B of the Appendix H (254403), Subsection 2, pp. 133 to 140; Response Set #1 Part 1 (257953), Subsection 2.8, p. 21 of 320; Attachment A.2, pp. 117 to 118 of 320 and pp. 221-231 of 320		
Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5}) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum	Appendix H.6, pp. 32 to 33, Table 13 Appendix B of the Appendix H (254403), Subsection 2, pp. 133 to 140; Response Set #1 Part 1 (257953), Subsections 2.8 and 2.9, p. 21 of 320; Attachment A.2, pp. 117 to 118 of 320 and pp. 221-231 of 320	No Yes	See DR AQ-7 to DR AQ-9

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Revision No. 01 Date: July 2025

Technical Area: Air Quality Project: Perkins Renewable Energy Project

Technical Staff: Wenjun Qian Huei-An (Ann) Chu/Yifan Ding

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

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SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	emissions rates and the assumed meteorological conditions;			
Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard; and	Section 4.1, Subsection 4.1.3, pp. 4.1-26 to 4.1-27 <u>Response Set #1 Part 1 (257953), Subsection 2.10, pp. 21 of 320 to 22 of 320</u>	No <u>Yes</u>	See DR-AQ-10
Appendix B (g) (8) (I) (iv)	An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5} .	Appendix H.6 <u>Response Set #1 Part 1 (257953), Subsection 2.9, p. 21 of 320</u>	No <u>Yes</u>	See DR-AQ-8, DR-AQ-9
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's impacts under (g)(1), provide the following information:	--	--	--

DATA COMPLETENESS WORKSHEET

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Technical Area: Air Quality Project: Perkins Renewable Energy Project

Technical Staff: Wenjun Qian Huei-An (Ann) Chu/Yifan Ding
Andres Perez

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

Technical Senior: Joseph Hughes-Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (J) (i)	The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and	Appendix H.6, pp. 34 to 35	Yes	
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	Appendix H.6, pp. 34 to 35	Yes	
Appendix B (g) (8) (K)	A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule.	Appendix H.3, pp. 23 to 27	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or	Section 4.1, Subsection 4.1.5, Table 4.1-11, Table 4.1-12, Table 4.1-13	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: July 2025

Technical Area: Air Quality Project: Perkins Renewable Energy Project

Technical Staff: Wenjun Qian Huei-An (Ann) Chu/Yifan Ding

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

Technical Senior: Joseph Hughes-Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix E.2, Table 2, Table 3	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1, Table 1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the	Appendix E.2 Response Set #1 Part 1 (257953), Subsection	No Yes	See DR-AQ-11

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Revision No. 01 Date: July 2025

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Technical Staff: Wenjun Qian Huei-An (Ann) Chu
Yifan Ding
Andres Perez

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

Technical Senior: Joseph Hughes
Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	steps the applicant has taken or plans to take to obtain such permits.	<u>2.11, p. 10;</u> <u>ATTACHMENT B, pp. 283</u> <u>of 320 to 286 of 320</u>		

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete ____ Incomplete **x**

Revision No. **01** Date: **July 2025**

Technical Area: **Biological Resources**

Project: Perkins Renewable Energy Project

J. Myrah/CDFW: M. Rodriguez,

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Staff: A. Resales, E. Weiss

Technical Senior: Eric Knight/Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Section 4.2; Appendix J.1; Appendix M.6 <u>Data Request Response Set #2 Response 3.1, BTR Attachment C.1, Sections 3.3.2.1 and 3.3.3, Sections 4, 4.1.20, 4.1.3 and 4.1.20.6, Sections 4.2.1 and 4.2.2, Table 4.2-4, Figures 1 and 10, Appendix C.1, BBCS Table 1 (Attachment C.7), Appendix J3, Set #2 Response 3.18, Figure 1</u>	No	See DR BIO-1, DR BIO-14, DR BIO-19, DR BIO-20 <u>See REV 1 DR BIO-6</u>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.2 (pp. 4.2-1 to 4.2-6); Appendix J.1 (pp. 7 to 10); Appendix M <u>Data Request Response Set #2 Response 3.1, BTR Attachment C.1, Sections 3.3.2.1 and 3.3.3, Sections 4, 4.1.20, 4.1.3 and 4.1.20.6, Sections 4.2.1 and 4.2.2, Table 4.2-4, Figures 1 and 10,</u>	No	See DR BIO-1, DR BIO-14, DR BIO-19, DR BIO-20 <u>See REV 1 DR BIO-5 and REV 1 DR BIO-6</u>

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: July 2025

Technical Area: Biological Resources

Project: Perkins Renewable Energy Project

J. Myrah/CDFW: M. Rodriguez,

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Staff: A. Resales, E. Weiss

Technical Senior: Eric Knight/Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		<u>Appendix C.1, BBCS Table 1 (Attachment C.7), Appendix J3, Set #2 Response 3.18, Figure 1</u>		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 4.2 (pp 4.2-1, 4.2-3, 4.2-47), Appendix J.1 (pp 6, 24-27), Appendix J2 (pp 9, 18-19), Appendix M <u>Data Request Response Set #2 Response 3.2, BTR Attachment C.1, Attachment C.7 and C.8</u>	No <u>Yes</u>	See DR BIO-2, DR BIO-32
[OPT-IN ONLY] Cal. Code Regs., tit. 20, § 1877 (a)	If the applicant is seeking incidental take authorization as described in California Fish and Game Code section 2081(b), the application shall include the information required in California Code of Regulations, title 14, section 783.2(a)(1)-(a)(10). If the applicant is seeking lake and streambed alteration authorization under Fish and Game Code section 1602, the application shall include the information required in California Fish and Game Code section 1602(a)(1)(A)-(F).	Appendix K <u>Data Request Response Set #2 Response 3.3, Attachment C.2, Figure 16, Table 6-1, BBCS Attachment C.7, Attachment C.9.</u>	No	See DR BIO-3, DR BIO-11, DR BIO-27, DR BIO-28, DR BIO-29 <u>See REV 1 DR BIO-1 to REV 1 DR BIO-6, REV 1 DR BIO-8, and REV 1 DR BIO-15</u>
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction,	Section 4.2 (pp. 4.2-6 to 4.2-41), Subsection 4.2.4, Appendix J.1, Section 1.3,	No	See DR BIO-3, DR BIO-6, DR BIO-9, DR BIO-14 to DR BIO-16, DR BIO-19, DR BIO-20, DR BIO-

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: July 2025

Technical Area: Biological Resources

Project: Perkins Renewable Energy Project

J. Myrah/CDFW: M. Rodriguez,

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Staff: A. Resales, E. Weiss

Technical Senior: Eric Knight/Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 2, Section 4, Subsection 4.2.7, Appendix D.1, Appendix D.2, Appendix K, Appendix L., Appendix M.1, Appendix M.2., Appendix M.3., Appendix M.4, Appendix M.5, Appendix M.6 <u>Data Request Response Set #2 Response 3.3, 3.6, 3.9, 3.14, 3.15, 3.18, 3.19, 3.22, 3.23, 3.25, Attachment C.2, Figure 16, Table 6-1, Attachment C.4, Attachment C.5, BBCS Attachment C.7, Attachment C.9., Opt-In App, Appendix J.5, Section 4.2.2,, p. 4.2-24 Attachment C.10</u>		23-DR-BIO-24, DR-BIO-25, DR-BIO-27, DR-BIO-28 <u>See REV 1 DR BIO-11 to REV 1 DR BIO-13, and REV 1 DR BIO-15</u>
Appendix B (g) (13) (A)	A regional overview and discussion of terrestrial and aquatic biological resources, with particular attention to sensitive biological resources within 10 miles of the project. In the discussion include a list of the USGS topographic quadrangle(s) utilized to search records from the California Natural Diversity	Section 4.2, Figure 4.2-2, Appendix J.3., J.4; <u>Data Request Response Set #2 Response 3.6, BRTR Sections 3.3.3., 4.1.13 and 4.1.23, Attachments C.1, C.3, C.4, C.5 and</u>	No <u>Yes</u>	See DR-BIO-6, DR-BIO-13

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Revision No. **01** Date: **July 2025**

Technical Area: **Biological Resources**

Project: Perkins Renewable Energy Project

J. Myrah/CDFW: M. Rodriguez,

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Staff: A. Resales, E. Weiss

Technical Senior: Eric Knight/Ann Crisp

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	Database (CNDDDB), and a citation which includes the date the CNDDDB was accessed. Include a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) showing sensitive biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan or similar open space land use plan or designation. Label the biological resources and survey areas as well as the project facilities. Sensitive biological resources include:	<u>C.11, Opt-In app, Section 4.2.1, Table 4.2-4, Section 4.2.2</u>		
Appendix B (g) (13) (A) (i)	species listed under state or federal Endangered Species Acts;	Section 4.2, Subsection 4.2.1, Table 4.2-3, Table 4.2-4, Appendix J.1, Section 3.1 to 3.4, Section 4.1 to 4.2, Appendix A; <u>Data Request Response Set #2 Response 3.6, BTR Attachment C.1, C.4, C.5, Section 3.3.3., 4.1.13, 4.1.23, Table 4.2-4 and 4.2-5, Opt-In app, Section 4.2.1, 4.2.2, Table 4.2-4, Attachment C.11</u>	No	See DR BIO-6, DR BIO-17 <u>See REV 1 DR BIO-6 to REV 1 DR BIO-8, REV 1 DR BIO-12</u>

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Appendix B (g) (13) (A) (ii)	species receiving consideration during environmental review under CEQA Guidelines 14 CCR Section 15380;	Section 4.2 (pp. 4.2-22 to 4.2-33), Table 4.2-4, Appendix J.1., Section 4.1, Appendix A, Appendix J.5 <u>Data Request Response Set #2 Response 3.1, BTR Attachment C.1, Section 4, Section 4.1.20</u>	No <u>Yes</u>	See DR BIO-1
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;	Section 4.2.2. (pp. 4.2-27, 4.2-31), Table 4.2-4, Appendix J.1., Section 4.1.8, 4.1.10, 4.1.12, Appendix A <u>Data Response Request Set #2 Response 3.1, BTR Attachment C.1, Section 4, Section 4.1.20, Opt-In Application Table 4.2-4, Attachment C.11., BCS (Attachment C.7), Section 4.1, Table 1</u>	No	See DR BIO-1, DR BIO-18 <u>See REV 1 DR BIO-8</u>
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;	Section 4.2 (pp. 4.2-30 to 4.2-33), Table 4.2-5, Appendix J.1., Section 3.3.2, Section 4.1.3 to 4.1.13, Appendix C, Table C	No	<u>See REV 1 DR BIO-8</u>

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		2., Table C 5., Table D 1., Appendix M.1, Appendix M.2., Appendix M.4 <u>Data Request Response Set #2 Response 3.1, BRTR Attachment C.1, Section 4, Section 4.1.20</u>		
Appendix B (g) (13) (A) (v)	species and habitats identified by local, state, and federal agencies as needing protection, including but not limited to those identified by the CNDDB, California Fish and Game Code, Title 14 of the California Code of Regulations, or where applicable, in Local Coastal Programs or in relevant decisions of the California Coastal Commission or other responsible agency;	Subsection 4.2.1 to 4.2.2; Appendix J.1, Sections 2.5, 3.3, 3.4, 4.1 to 4.3, (Appendix A, B), Appendix J.2, J.3; <u>Data Request Response Set #2 Response 3.15, BRTR Section 4.2.8, Attachment C.1</u>	No <u>Yes</u>	See DR-BIO-6 , DR-BIO-16
Appendix B (g) (13) (A) (vi)	locally significant species that are rare or uncommon in a local context such as county or region or is so designated in local or regional plans, policies, or ordinances;	Section 4.2, Table 4.2-3, Table 4.2-4, Appendix J.1, Section 3.3, 3.4, 4.1 to 4.3 <u>Data Request Response Set #2 Response 3.1, BRTR Attachment C.1, Section 4, Section 4.1.20</u>	No <u>Yes</u>	See DR-BIO-1
Appendix B (g) (13) (A) (vii)	plant species listed as rare under the California Native Plant Protection Act;	Section 4.2, pp. 4.2-10 to 4.2-13, Figure 4.2-2, Table	No <u>Yes</u>	See DR-BIO-1

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		4.2-3, Subsection 4.2.2, pp. 4.2-22 to 4.2-24 <u>Data Request Response Set #2 Response 3.1, BTR Attachment C.1, Section 4, Section 4.1.20</u>		
Appendix B (g) (13) (A) (viii)	established native resident or migratory wildlife corridors or wildlife nursery sites.	Subsection 4.2.2, pp. 4.2-19 to 4.2-21, 4.2-36 to 4.2-38, and 4.2-41 <u>Data Request Response Set #2 Response 3.1, BTR Attachment C.1, Section 4, Section 4.1.20</u>	No	See DR-BIO-1 <u>See REV 1 DR BIO-6 and REV 1 DR BIO-8</u>
Appendix B (g) (13) (B)	Include a list of the species and habitat(s) observed and those with a potential to occur within 1 mile of the project site and 1,000 feet from the outer edge of linear facility corridors. Maps or aerial photographs shall include the following:	Section 4.2, Tables 4.2-1 to 4.2-4; Appendix J.1 (Appendix A, B, C, D) and Appendix J.3 <u>Data Request Response Set #2 Response 3.1, BTR Attachment C.1, Section 4, Section 4.1.20</u>	No Yes	See DR-BIO-1
Appendix B (g) (13) (B) (i)	Detailed maps at a scale of 1:6,000 or color aerial photographs taken at a recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under	Appendix J.1, Figures 1 to 11, Appendix J.2, Figures 1 to 13, and Appendix J.3; <u>Data Request Response</u>	No	See DR-BIO-5, DR-BIO-12, DR-BIO-13 <u>See REV 1 DR BIO-14</u>

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	confidential cover) and 1:350,000 (for public viewing) that show the proposed project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the CNDDDB, and the associated areas where biological surveys were conducted. Label the biological resources and survey areas as well as the project facilities.	<u>Set #2 Response 3.5, BTR Figures 9 and 10, Attachment C.1 and C.3, Appendix J.3</u>		
Appendix B (g) (13) (B) (ii)	Provide an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates. The geographical extent of the nitrogen deposition map(s) should include the entire plume and a radius of 6 (six) miles from the source, specifically identifying acres of sensitive habitat(s) within each isopleth Modeling parameters and files shall be provided.	N/A	N/A	N/A
Appendix B (g) (13) (B) (iii)	An aerial photo depicting state and federal jurisdictional features including state waters and wetlands delineated on maps at a scale of (1:2,400) showing any potential jurisdictional features delineated out to 250 feet from the edge of disturbance if wetlands occur within 250 feet of the project site and/or related facilities that would be included with the U.S. Army Corps of Engineers Section 404 Permit application, Regional Water Quality Control	Appendix J.3, Appendix J.4.; Appendix K; Appendix L	No	See DR BIO-27 <u>See REV 1 DR BIO-5</u>

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	Board (RWQCB) application, or California Department of Fish and Wildlife Section 1600 et seq. permit requirements. For projects proposed to be located within the coastal zone, also provide aerial photographs or maps as described above that identify wetlands as defined by the Coastal Act and under the jurisdiction of the California Coastal Commission.			
Appendix B (g) (13) (B) (iv)	Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources.	Kiteworks <u>Data Request Response Set #2 Response 3.3, 3.4</u>	No	See DR BIO-1, DR BIO-3, DR BIO-4, DR BIO-13, DR BIO-28 <u>See REV 1 DR BIO-6</u>
Appendix B (g) (13) (C)	A discussion of the biological resources at the proposed project site and related facilities. Related facilities include, but are not limited to, laydown and parking areas, gas and water supply pipelines, transmission lines, and roads. The discussion shall address the distribution of vegetation community types, denning or nesting sites, population concentrations, migration corridors, breeding habitats, and other appropriate biological resources including the following:	Subsection 4.2.1; Appendix J.1 and Appendix J.2 <u>Data Request Response Set #2 Response 3.1, BRT Attachment C.1, Section 4, Section 4.1.20</u>	No	See DR BIO-1 <u>See REV 1 DR BIO-8</u>
Appendix B (g) (13) (C) (i)	A list of sensitive species and habitats with a potential to occur (defined in (A) above) and include status (state, federal, California Native Plant Society, global rank, state rank, etc.)	Section 4.2, pp. 4.2-11 to 4.2-19; Appendix J.1, pp. 4 to 6, 11 to 23, (Appendix A and Appendix B); <u>Data</u>	No <u>Yes</u>	See DR BIO-6, DR BIO-14, DR BIO-30

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		<u>Request Response Set #2 Response 3.6, BRTR Table 4.2-4, Attachment C.1, C.4, C.5</u>		
Appendix B (g) (13) (C) (iii)	Perform nitrogen deposition modeling including the complete citation for references used in determining deposition rates and location. Specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry deposition. Describe habitat and species potentially affected.	N/A	N/A	N/A
Appendix B (g) (13) (D)	A description and results of all field studies and specialized surveys (e.g., focused and protocol) used to provide biological baseline information about the project site and associated facilities. Include copies of the CNDDDB records and field survey forms completed by the applicant's biologist(s). Identify the date(s) the surveys were completed, methods used to complete the surveys, and the name(s) and qualifications of the biologists conducting the surveys. Include:	Subsection 4.2.1, Tables 4.2-3 and 4.2-4, Subsection 4.2.2; Appendix J.1, Section 3.4, Table 3, Tables C 1. to C 5, (Appendix C and Appendix D) <u>Data Request Response Set #2 Response 3.6, 3.7, 3.14, 3.16, 3.17 and 3.26, Attachment C.4, C.5, C.6, BRTR Section 3.3.3, 4.1.13, 4.1.20 and 4.1.20.6, Attachment C.1, Opt-In app Section 4.2.1 and 4.2.2., Table</u>	No	See DR BIO-6, DR BIO-7, DR BIO-14, DR BIO-17, DR BIO-18, DR BIO-30 <u>See REV 1 DR BIO-5 and REV 1 DR BIO-8</u>

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		<u>4.2-4 and Table 4.2-5, BBCS Table 1, Attachment C.7</u>		
Appendix B (g) (13) (D) (i)	Current biological resources surveys conducted using appropriate field survey protocols (include references) during the appropriate season(s). State and federal agencies with jurisdiction shall be consulted for field survey protocol guidance prior to surveys if a protocol exists.	Section 3.3, Subsection 3.3.2.1, Section 3.4; Section 4.2, Subsections 4.2.1 and 4.2.2; Appendix J.1, Appendix J.2; <u>Data Request Response Set #2 Response 3.8, 3.27, BRTS Sections 3.3.3, 4.1.20, 4.1.20.6, 4.1.21 and 4.1.22, Attachment C.1, Table 4.2-4, BBCS Table 1, Attachment C.7</u>	No	See DR BIO-8, DR BIO-14, DR BIO-19, DR BIO-31 <u>See REV 1 DR BIO-6, REV 1 DR BIO-8</u>
Appendix B (g) (13) (D) (ii)	If the project or any related facilities could impact federal or state jurisdictional wetland, provide completed Army Corps of Engineers wetland delineation forms or determination of wetland status pursuant to Coastal Act or CDFW requirements, as applicable to the location, name(s) and qualifications of biologist(s) completing the delineation, the results of the delineation and a table showing jurisdictional features including state waters and wetland acreage amounts to be impacted.	Section 4.2, Table 4.2-2, Tables 4.4-2 and 4.2-3; Appendix A, Figures 1 to 13; Appendix C; Appendix J.2; Appendix J.3; Appendix K, Table 2, Table 3, Figure 7; Appendix L, Tables 2 and 3, Figure 7	No	See DR BIO-7 <u>See REV 1 DR BIO-1 to REV 1 DR BIO-4</u>
Appendix B (g) (13) (E))	Impacts discussion of all impacts (direct, indirect, and cumulative) to biological	Subsections 4.2.2 and 4.2.3	No	See DR BIO-1, DR BIO-14, DR BIO-23

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Technical Staff: A. Resales, E. Weiss
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SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	resources from project site preparation, construction activities, plant operation, maintenance, closure, and decommissioning. Discussion shall also address sensitive species habitat impacts from air emissions (i.e., nitrogen deposition);	<u>Data Request Response Set #2 Response 3.1, BTR Attachment C.1, Section 4, Section 4.1.20</u>		<u>See REV 1 DR BIO-1, REV 1 DR BIO-2, and REV 1 DR BIO-7</u>
Appendix B (g) (13) (F)	A discussion of all feasible mitigation measures and an evaluation of their anticipated efficacy in reducing the level of impacts, including, but not limited to the following:	Subsection 4.2.2, pp. 4.2-20 to 4.2-39, Subsection 4.2.4; Appendix D.1, Appendix D.2 <u>Data Request Response Set #2 Response 3.1, BTR Attachment C.1, Section 4, Section 4.1.20</u>	No	See DR BIO-1, DR BIO-20, DR BIO-21, DR BIO-25 <u>See REV 1 DR BIO-9 to REV 1 DR BIO-12, and REV 1 DR BIO-15</u>
Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources.	Subsection 4.2.2, pp. 4.2-20 to 4.2-39, Subsection 4.2.4; Appendix D.1 and D.2 <u>Data Request Response Set #2 Response 3.1, BTR Attachment C.1, Section 4, Section 4.1.20</u>	No	See DR BIO-1, DR BIO-14, DR BIO-20, DR BIO-24 <u>See REV 1 DR BIO-8 to REV 1 DR BIO-13, and REV 1 DR BIO-15</u>
Appendix B (g) (13) (F) (ii)	All off-site habitat mitigation such as habitat improvement or compensation including management, and an identification of appropriate agency contacts for coordination	Appendix D.1, Appendix D.2; Appendix E.1; Appendix J.5 and J.6	No	See DR BIO-1, DR BIO-10, DR BIO-11, DR BIO-20 to DR BIO-22, and DR BIO-25 <u>See REV 1 DR BIO-10 to REV 1 DR BIO-12</u>

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	and verification of proposed habitat mitigation measures.	<u>Data Request Response Set #2 Response 3.1 and 3.23, BRTR Attachment C.1, Section 4, Section 4.1.20, Appendix J.5, Opt-In app Section 4.2.2, Attachment C.9 and C.10</u>		
Appendix B (g) (13) (F) (iii)	Educational programs to enhance employee awareness during construction and operation to protect biological resources.	Subsection 4.2.2, pp. 4.2-25 and 4.2-29); Appendix K; Appendix L; Appendix M.1, M2, M.3, M4, and M5 <u>Set #2 Response 3.1, BRTR Attachment C.1, Section 4, Section 4.1.20</u>	No <u>Yes</u>	See DR BIO-1
Appendix B (g) (13) (G)	A discussion of compliance and monitoring programs to ensure the effectiveness of impact avoidance and mitigation measures incorporated into the project.	Subsection 4.2.4; Appendix D.1, Appendix D.2; Appendix K, Section 12A, Section 12B, Appendix M.1, M.2, M.3, M.4, M.5, and M.6; <u>Data Request Response Set #2 Response 3.1, BRTR Attachment C.1, Section 4, Section 4.1.20</u>	No	See DR BIO-1 <u>See REV 1 DR BIO-12 and REV 1 DR BIO-15</u>

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Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Staff: A. Resales, E. Weiss

Technical Senior: Eric Knight/Ann Crisp

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Appendix B (g) (13) (H)	Submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding whether federal or state permits from other agencies such as the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project.	Section 4.2	No <u>Yes</u>	See DR-BIO-26
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.2, Tables 4.2-5 to 4.2-7	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix E.2	Yes	

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Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

J. Myrah/CDFW: M. Rodriguez,
 Technical Staff: A. Resales, E. Weiss
 Technical Senior: Eric Knight/Ann Crisp

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Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1 <u>Data Request Response Set #2 Response 3.10, Table 1 Appendix E</u>	No <u>Yes</u>	See DR-BIO-10
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix E.2, Table 2 <u>Data Request Response Set #2 Response 3.24</u>	No <u>Yes</u>	See DR-BIO-26

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Revision No. **01** Date: **March 28, 2024**
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Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Perkins Renewable Energy Project

Technical Staff: **E. Erckenbrack, S. Owen**
W. Larson, C. Travis

Project Manager: **Lisa Worrall/Ann Crisp**

Docket: 24-OPT-01

Technical Senior: **Gabriel Roark**

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Section 4.3, pp. 4.3-42 to 4.3-44 Data Request Response Set #3 Response 3.1, Attachment D, pp. 4.3-47 to 4.3-51	No Yes	See DR-CUL/TRI-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.3, pp. 4.3-28 to 4.3-42	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 4.3, Table 4.3-1, pp. 4.3-45 to 4.3-64 Data Request Response Set #3 Response 3.3, Attachment D, pp. 4.3-14, 4.3-53, and 4.3-70, Table 4.3-1	No Yes	See DRs-CUL/TRI-2, CUL/TRI-3
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the	Section 4.3, pp. 4.3-2 to 4.3-17 and 4.3-29 to 4.3-45 Data Request Response Set #3 Response 3.1, Attachment D, pp. 4.3-47 to 4.3-51	No Yes	See DR-CUL/TRI-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: March 28, 2024
July 2025

Technical Area: Cultural Resources and Tribal Cultural Resources

Project: Perkins Renewable Energy Project

Technical Staff: E. Erckenbrack, S. Owen
W. Larson, C. Travis

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (2)	Cultural resources and tribal cultural resources together comprise objects, buildings, structures, sites, features, areas, places, records, sacred places, cultural landscapes, or manuscripts, all of which may have significance according to criteria outlined in sections 21074 and 21084.2 of the Public Resources Code.	Section 4.3, pp. 4.3-1, 4.3-12 to 14, and 4.3-27 to 4.3-28	Yes	
Appendix B (g) (2) (A)	A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location. This regional summary must address the potential for buried cultural resources and tribal cultural resources to occur in the project area. The summary, together with literature search results, must inform the field methods employed for identifying cultural resources and tribal cultural resources in the project area.	Section 4.3, pp. 4.3-2 to 4.3-17	Yes	
Appendix B (g) (2) (B)	The results of a literature search to identify cultural resources and tribal cultural resources within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on	Section 4.3, p. 4.3-36; Confidential Appendix N.1; Data Request Response Set #3 Responses 3.5-3.15, Attachment D, pp.	No	<u>See DR CUL/TRI-4 to DR CUL/TRI-14</u> <u>See REV DR CUL/TRI-1, REV DR CUL/TRI-2, REV DR CUL/TRI-3</u>

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Cultural Resources and Tribal Cultural Resources** Project: Perkins Renewable Energy Project Revision No. 01 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: E. Erckenbrack, S. Owen
 Technical Senior: W. Larson, C. Travis
 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	each side of the linear facilities. Identify any cultural resources or tribal cultural resources listed pursuant to ordinance by a city or county or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources and tribal cultural resources must be completed by, or under the direction of, individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR § 4853) shall be provided for all cultural resources and tribal cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5-minute quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided. Copies also shall be provided of all technical reports whose survey coverage is wholly or partly	<u>4.3-32, 4.3-37,</u> <u>Confidential CHRIS maps</u>		

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: March 28, 2024
July 2025

Technical Area: Cultural Resources and Tribal Cultural Resources

Project: Perkins Renewable Energy Project

Technical Staff: E. Erckenbrack, S. Owen
W. Larson, C. Travis

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	within 0.25 mile of the area surveyed for the project under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.			
Appendix B (g) (2) (C)	The results of new cultural resource and tribal resource surveys or surveys less than 5 years old shall be provided if survey records of the area potentially affected by the project are more than 5 years old. Surveys to identify new cultural resources and tribal cultural resources must be completed by (or under the direction of) individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. New pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending to no less than 200 feet around the project site, substations and staging areas, and to no less than 50 feet to either side of the right-of-way of project linear facility routes. New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than 0.5 mile out from the proposed plant site and from the	Section 4.3, pp. 4.3-28 and 4.3-29; Confidential Appendix N.2; <u>Data Request Response Set #3</u> <u>Response 3.16</u>	<u>No</u>	<u>See REV DR CUL/TRI-15</u>

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: March 28, 2024
July 2025

Technical Area: Cultural Resources and Tribal Cultural Resources

Project: Perkins Renewable Energy Project

Technical Staff: E. Erckenbrack, S. Owen
W. Larson, C. Travis

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	routes of all above-ground linear facilities. New historic architecture field surveys in urban and suburban areas shall be conducted inclusive of the project site, extending no less than one parcel's distance from all proposed plant site boundaries. New historic architecture field reconnaissance ("windshield survey") in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age. A technical report of the results of the new surveys, conforming to the Archaeological Resource Management Report format (CA Office of Historic Preservation Feb 1990), which is incorporated by reference in its entirety, shall be separately provided and submitted (under confidential cover if archaeological resource or other sensitive resource locations are included). Information included in the technical report shall also be provided in the application, other sensitive resources, or areas of religious significance) shall be submitted under a request for confidentiality pursuant to			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Cultural Resources and Tribal Cultural Resources** Project: Perkins Renewable Energy Project Revision No. 01 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: E. Erckenbrack, S. Owen
 Technical Senior: W. Larson, C. Travis
 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	California Code of Regulations, title 20, section 2501 et seq. At a minimum, the technical report shall include:			
Appendix B (g) (2) (C) (i)	The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B);	Confidential Appendix N.2; Set #3 Response 3.16	No	See REV DR CUL/TRI-15
Appendix B (g) (2) (C) (ii)	The survey procedures and methodology used to identify cultural and tribal cultural resources and a discussion of the cultural and tribal resources identified by the survey;	Confidential Appendix N.2; Set #3 Response 3.16	No	See REV DR CUL/TRI-15
Appendix B (g) (2) (C) (iii)	Copies of all new and updated DPR 523(A) forms. If a cultural resource or tribal cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource;	Confidential Appendix N.2; Set #3 Response 3.16	No	See REV DR CUL/TRI-15
Appendix B (g) (2) (C) (iv)	A map at a scale of 1:24,000 (U.S. Geological Survey topographic quadrangle) depicting the locations of all previously known and newly identified cultural and tribal cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii); and	Confidential Appendix N.2; Set #3 Response 3.16	No	See REV DR CUL/TRI-15
Appendix B (g) (2) (C) (v)	The names and qualifications of the cultural resources specialists who contributed to and were responsible for literature searches, surveys, and preparation of the technical report.	Confidential Appendix N.2; Set #3 Response 3.16	No	See REV DR CUL/TRI-15

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **Cultural Resources and Tribal Cultural Resources**
 Technical Area: **Cultural Resources** Project: Perkins Renewable Energy Project Revision No. 01 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: E. Erckenbrack, S. Owen
 Technical Senior: W. Larson, C. Travis
 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (2) (D) (i)	A copy of the applicant's request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, and copies of any correspondence received from the NAHC.	Section 4.3 pp. 4.3-41 to 4.3-42 Data Request Response Set #3 Response 3.17, Attachment D, PDF pp. 224-232	No Yes	See DR-CUL/TRI-16
Appendix B (g) (2) (D) (ii)	A copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Notification to Native Americans shall include a project description and map.	Section 4.3 pp. 4.3-41 to 4.3-42 Set #3 Response 3.18, Confidential Tribal Letters & Responses	No Yes	See DR-CUL/TRI-17
Appendix B (g) (2) (D) (iii)	A written summary of any oral responses.	Section 4.3, pp. 4.3-41 to 4.3-42	Yes	
Appendix B (g) (2) (E)	Include in the discussion of proposed mitigation measures required by (g)(1):	--	--	--
Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural and tribal cultural resources;	Section 4.3, p. 4.3-43 Appendix D.1; Data Request Response Set #3 Response 3.19, Appendix D, p. 4.3-51	No Yes	See DR-CUL/TRI-18
Appendix B (g) (2) (E) (ii)	A set of contingency measures proposed to mitigate potential impacts to previously unknown cultural and tribal cultural resources and any unanticipated impacts to known cultural or tribal cultural resources; and	Section 4.3, p. 4.3-43; Appendix D.1, pp. 7, 22 to 25	Yes	
Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation	Section 4.3, p. 4.3-43; Appendix D.1, pp. 7, 22 to 23	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **Cultural Resources and Tribal Cultural Resources**
 Technical Area: **Cultural Resources** Project: Perkins Renewable Energy Project Revision No. 01 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: E. Erckenbrack, S. Owen
 Technical Senior: W. Larson, C. Travis
 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	to protect cultural and tribal cultural resources.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.3, p. 4.3-43, Tables 4.3-4 and 4.3-5	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 4.3, p. 4.3-45; Appendix E.1 and E.2	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 4.3, Appendix E.1 <u>Data Request Response Set #2 Response 3.10, Table 1; Set #3 Response 3.20, Attachment D, PDF p. 224</u>	No <u>Yes</u>	See DR-CUL/TRI-19

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: March 28, 2024
July 2025

Technical Area: Cultural Resources and Tribal Cultural Resources

Project: Perkins Renewable Energy Project

Technical Staff: E. Erckenbrack, S. Owen
W. Larson, C. Travis

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 2, p. 2.11-45; Appendix F <u>Data Request Response Set #1 Response, Attachment D, Updated Permit Table 1</u>	No <u>Yes</u>	See DR-CUL/TRI-20

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete _____ Incomplete x

Technical Area: Hazardous Materials Handling

Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project

Docket: 24-OPT-01

Revision No. 01

Date: July 2025

Technical Staff: Paul Miller

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.5.2, pp. 4.5-2 to 4.5-3 (second set of -2 and -3 – page numbering problem)	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.5.1	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.5.7, p 4.5-19	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Subsections 4.5.1 and 4.5.2 to 4.5.5	Yes	
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as	Section 4.5, p. 4.5-5, Tables 4.5-1 to 4.5-3	No	See DR-HAZ-1 to DR-HAZ-4

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete _____ Incomplete x
 Technical Area: Hazardous Materials Handling
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 01 Date: July 2025
 Technical Staff: Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	defined in California Code of Regulations, title 22, § 66261.20 et seq., and a discussion of the toxicity of each material.	<u>Data Request Response Set #1, Part 1, TN 258953, Sections 4.1 to 4.4, pp. 14 to 19</u>		<u>See REV-1 DR HAZ-1 and REV-1 DR HAZ-2</u>
Appendix B (g) (10) (B)	A map at a scale of 1:24,000 depicting the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous materials.	N/A	N/A	N/A
Appendix B (g) (10) (C)	A discussion of the storage and handling system for each hazardous material used or stored at the site.	Subsection 4.5-1, Table 4.5-1 <u>Data Request Response Set #1, Part 1, TN 258953, Sections 4.1 to 4.4, pp. 14 to 19</u>	No	See DR HAZ-1 to DR HAZ-4 <u>See REV-1 DR HAZ-1 and REV-1 DR HAZ-2</u>
Appendix B (g) (10) (D)	The protocol that will be used in modeling potential consequences of accidental releases that could result in off site impacts. Identify the model(s) to be used, a description of all input assumptions, including meteorological conditions. The results of the modeling analysis can be submitted after the application is complete.	N/A	N/A	N/A
Appendix B (g) (10) (E)	A discussion of whether a risk management plan (Health and Safety Code § 25531 et seq.) will be required, and if so, the requirements that will likely be incorporated into the plan.	Subsection 4.5.5, p. 4.5-18, Table 4.5-5	Yes	
Appendix B (g) (10) (F)	A discussion of measures proposed to reduce the risk of any release of hazardous materials.	Subsection 4.5.4, Appendix F, C-404	Yes	

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete _____ Incomplete x

Technical Area: Hazardous Materials Handling

Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project

Docket: 24-OPT-01

Revision No. 01

Date: July 2025

Technical Staff: Paul Miller

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	Subsection 4.5.2, pp. 4.5-3 to 4.5-9	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 4.5.5, Tables 4.5-4 to Table 4.5-6	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 4.5.6; Appendices E.1 to Appendix E.2	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 4.5.6; Appendix E.1 <u>Data Request Response Set #1, Part 1, TN 258953, Section 4.5, pp. 19 to 20</u>	No <u>Yes</u>	See DR-HAZ-5
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete _____ Incomplete x

Technical Area: Hazardous Materials Handling

Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project

Docket: 24-OPT-01

Revision No. 01

Date: July 2025

Technical Staff: Paul Miller

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	obtained and the steps the applicant has taken or plans to take to obtain such permits.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Land Use**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. ~~01~~ Date: ~~March 28, 2024~~
 Technical Staff: Lisa Harmon
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.6.2, p. 4.6-13	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.6.1, pp. 4.6-1 to 4.6.13, Figures 4.6-1 to 4.6-6	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.6.6, pp 4.6-24 to 4.6-25	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Subsections 4.6.1 to 4.6.3, pp. 4.6-3 to 4.6-21, Table 4.6-2, pp. 4.6-15 to 4.6-16	Yes	

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Land Use**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. **01** Date: **July 2025**
 Technical Staff: Lisa Harmon
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (3) (A)	A discussion of existing land uses, general plan land use designations, and current zoning districts (including any overlay districts) at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include:	Subsection 4.6.1, pp. 4.6-3 to 4.6-13, Table 4.6-1, p. 4.6-3; Figure 4.6-2, p. 4.6-4, Figure 4.6-3, p.4.6-5, Figure 4.6-4, p. 4.6-8	Yes	
Appendix B (g) (3) (A) (i)	An identification of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses;	Subsection 4.6.1, pp. 4.6-11 to 4.6-13, Figure 4.6-6, p. 4.6-12; <u>Data Request Response Set #1 Part 1 (TN 257953), subsection 5.1, p. 21</u>	No <u>Yes</u>	See DR LAND-1
Appendix B (g) (3) (A) (ii)	A discussion of any recent or proposed zone changes and/or general plan amendments; noticed by an elected or appointed board, commission, or similar entity at the state or local level;	Subsection 4.6.3, p. 4.6-20; <u>Data Request Response Set #1 Part 1 (TN 257953), subsection 5.2, p 21</u>	No <u>Yes</u>	See DR LAND-2
Appendix B (g) (3) (A) (iii)	Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes or developments identified in subsection (g)(3)(A)(ii); and	Subsection 4.02, pp. 4.0-2 to 4.0-9; Table 4.1, p. 4.3; Table 4.2, pp. 4.4 to 4.7 [sic], Figure 4-1, p. 4.0-8, Figure 4.2, p. 4.0-9; Subsection 4.6.3, p. 4.6-20; <u>Data Request Response Set #1, Part 1 TN 257953, Attachment C, Table 1, Figure 1, Table 2, Figure 2</u>	No <u>Yes</u>	See DR LAND-3

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Land Use**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 01 Date: **July 2025**
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 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (3) (A) (iv)	Legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan designations, specific plan designations, and zoning have been clearly delineated.	Subsection 4.6.1, Figure 4.6-2, p.4.6-4; Figure 4.6-3, p.4.6-5; Figure 4.6-4, p. 4.5-8	Yes	
Appendix B (g) (3) (B)	A discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans and policies adopted by any federal, state, regional, or local planning agencies. The discussion shall identify the need, if any, for land use decisions by another public agency or as part of the commission's decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations.	Subsection 4.6.1, pp. 4.6-3 to 4.6-7, Subsection 4.6.2, p. 4.6-15 to 4.6-18, Table 4.6-2, pp. 4.6-15 to 4.6-17; <u>Data Request Response Set #1, Part 1 TN 257953, subsection 5.4 and subsection 5.7, pp. 22 to 23</u>	No	See DR LAND-4 and DR LAND-7 <u>See REV 1 DR LAND-1</u>
Appendix B (g) (3) (C)	A discussion of the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining	Subsection 4.6.1, pp. 4.6-3 to 4.6-7, Subsection 4.6.2, pp. 4.6-16 to 4.6-17; Appendix A.1, Table 1, Appendix A.2, Table 2;	No	See DR LAND-4 <u>See REV 1 DR LAND-1</u>

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Land Use**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 01 Date: March 28, 2024
 Technical Staff: Lisa Harmon
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	those parcels so that the proposed project, excluding linears and temporary laydown or staging area, will be located on a single legal parcel. The merger need not occur prior to a decision on the Application but must be completed prior to the start of construction.	Appendix D.2; <u>Data Request Response Set #1, Part 1, TN 257953, subsection 5.4, p. 22</u>		
Appendix B (g) (3) (D)	A map at a scale of 1:24,000 and written description of agricultural land uses found within all areas affected by the proposed project. The description shall include:	Subsection 4.6.1, p. 4.6-7, 4.6-9, and p. 4.6-10, Figure 4.6-5, Subsection 4.6.2, pp. 4.6-18, Figure 4.6-5, p. 4.6-9	Yes	
Appendix B (g) (3) (D) (i)	Land classifications as shown on the California Department of Conservation's Farmland Mapping and Monitoring Program's Important Farmland maps, crop types, irrigation systems, and any special cultivation practices;	Subsection 4.6.1, p. 4.6-9, Figure 4.6-5	Yes	
Appendix B (g) (3) (D) (ii)	Whether agricultural land affected by the project was historically classified Farmland as defined by the California Department of Conservation (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland) as specified in Public Resources Code section 21060.1; and	N/A	N/A	
Appendix B (g) (3) (D) (iii)	Direct, indirect, and cumulative effects on agricultural land uses. If the proposed site or related facilities are subject to an Agricultural Land Conservation contract, provide a written copy and a discussion of the status of the expiration or canceling of such contract.	Subsection 4.6.2, pp. 4.6-18 to 4.6-20, Subsection 4.6.3, p. 4.6-20	Yes	

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Land Use**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. ~~01~~ Date: **July 2025**
 Technical Staff: Lisa Harmon
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 4.6.4 [sic.], pp. 4.6-21 to 4.6-24; Table 4.6-3, pp. 4.6-21 to 4.6-22, Table 4.6-4, pp. 4.6-22, Table 4.6-5, pp. 4.6-22 to 4.6-24; <u>Data Request Response Set #1 Part 1 TN 257953, subsection 5.5, p. 22, Appendix D, Table 1</u>	No <u>Yes</u>	See DR LAND-5
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 4.6.5, p. 4.6-24; Appendix E.2, Table 2, pp. 2 to 3, Table 3, pp. 3 to 4	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1, Table 1, pp. 1 to 3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 4.6.5, p. 4.24; <u>Data Request Response Set #1, Part 1, TN 257953, subsection 5.6, p. 22,</u>	No <u>Yes</u>	See DR LAND-6

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x**
Technical Area: **Land Use**
Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
Docket: 24-OPT-01

Revision No. ~~01~~ Date: ~~March 28, 2024~~
Technical Staff: Lisa Harmon
Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		<u>Attachment B, Table 1 and Table 2</u>		

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete ____ Incomplete x

Revision No. 01 Date: July 2025

Technical Area: Public Health

Project: Perkins Renewable Energy Project

Technical Staff: Huei-An (Ann) Chu

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Wenjun Qian Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 4.9, Subsection 4.9.2, pp. 4.9-4 to 4.9-6	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.9, Subsection 4.9.1, pp. 4.9-1 to 4.9-4	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.9, Subsection 4.9.7, p. 4.9-10	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference	Section 4.9, Subsections 4.9.1, 4.9.2, 4.9.3, pp. 4.9-1 to 4.9-6 <u>Response Set #1 Part 1 (257953), Subsection 8.2, p. 40 of 320; Subsection 8.3, p. 40 of 320; Subsection 1.4.4, pp. 1-9</u>	No	See DR PH-2 and DR PH-3 <u>See REV 1 DR PH-1 to REV DR PH-5</u>

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete ____ Incomplete x

Revision No. 01 Date: July 2025

Technical Area: Public Health

Project: Perkins Renewable Energy Project

Technical Staff: Huei-An (Ann) Chu

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Staff: Wenjun Qian

Technical Senior: Wenjun Qian Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (9) (A)	An assessment of the potential risk to human health from the project's hazardous air emissions using the Air Resources Board Hotspots Analysis and Reporting Program (HARP) (Health and Safety Code §§44360-44366) or its successor and Approved Risk Assessment Health Values. These values should include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005).	Section 4.9, Subsection 4.9.2, pp. 4.9-4 to 4.9-6 <u>Response Set #1 Part 1 (257953), Subsection 8.2, p. 40 of 320;</u> <u>Response Set #1 Part 1 (257953), Subsection 8.3, p. 40 of 320;</u> <u>Subsection 1.4.4, pp. 1-9</u>	No	See DR PH-2, DR PH-3 <u>See REV 1 DR PH-1, REV 1 DR PH-4, and REV DR PH-5</u>
Appendix B (g) (9) (B)	A listing of the input data and output results, in both electronic and print formats, used to prepare the HARP health risk assessment.	Section 4.9, Subsection 4.9.2, pp. 4.9-4 to 4.9-6 <u>Response Set #1 Part 1 (257953), Subsection 8.3, p. 40 of 320;</u> <u>Subsection 1.4.4, pp. 1-9</u>	No	See DR PH-3 <u>See REV 1 DR PH-1 to REV DR PH-5</u>
Appendix B (g) (9) (C)	Identification of available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases.	Section 4.9, Subsection 4.9.1, pp. 4.9-1 to 4.9-4	Yes	

DATA COMPLETENESS WORKSHEET

March 28, 2024

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Technical Staff: Huei-An (Ann) Chu

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Staff: Wenjun Qian

Technical Senior: Wenjun Qian Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (9) (D)	A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).	Section 4.9, Subsection 4.9.1, p. 4.9-2 <u>Response Set #1 Part 1 (257953), Subsection 8.1, p. 40 of 320</u>	No <u>Yes</u>	See DR-PH-1
Appendix B (g) (9) (E)	For this section, the following definitions apply:	--	--	--
Appendix B (g) (9) (E) (i)	A sensitive receptor refers to infants and children, the elderly, and the chronically ill, and any other member of the general population who is more susceptible to the effects of the exposure than the population at large;	Section 4.9, Subsection 4.9.1, p. 4.9-2	Yes	
Appendix B (g) (9) (E) (ii)	An acute exposure is one that occurs over a time period of less than or equal to one (1) hour; and	Section 4.9, Subsection 4.9.1, p. 4.9-3 <u>Response Set #1 Part 1 (257953), Subsection 8.2, p. 40 of 320, Subsection 8.3, p. 40 of 320; Subsection 1.4.4, pp. 1-9</u>	No	See DR-PH-2 and DR-PH-3 <u>See REV 1 DR PH-1, REV 1 DR PH-4, and REV DR PH-5</u>
Appendix B (g) (9) (E) (iii)	A chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years.	Section 4.9, Subsection 4.9.1, p. 4.9-3 <u>Response Set #1 Part 1 (257953), Subsection 8.2, p. 40 of 320, Subsection 8.3, p. 40 of 320; Subsection 1.4.4, pp. 1-9</u>	No	See DR-PH-2 and DR-PH-3 <u>See REV 1 DR PH-1</u>

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete ____ Incomplete x

Revision No. 01 Date: July 2025

Technical Area: Public Health

Project: Perkins Renewable Energy Project

Technical Staff: Huei-An (Ann) Chu

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Staff: Wenjun Qian

Technical Senior: Wenjun Qian Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.9, Subsection 4.9.5, Table 4.9-1, Table 4.9-2, Table 4.9-3, pp. 4.9-7 to 4.9-9	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix E.2, Table 2, Table 3	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1, Table 1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be	Appendix E.2, Table 2, Table 3	Yes	

DATA COMPLETENESS WORKSHEET

March 28, 2024

Completeness: Complete ____ Incomplete **x**

Revision No. **01** Date: **July 2025**

Technical Area: **Public Health**

Project: Perkins Renewable Energy Project

Technical Staff: **Huei-An (Ann) Chu**

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Wenjun Qian

Wenjun Qian Joseph

Technical Senior: Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	obtained and the steps the applicant has taken or plans to take to obtain such permits.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 01 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.10.2, pp. 4.10-41 to 4.10-44	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.10.2, pp. 4.10-41 to 4.10-44	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.10.7, pp. 4.10-77 to 4.10-79	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the	Subsections 4.10.1 to 4.10.7; <u>Response Set #1 Part 1 (TN 257953), Section 9, pp. 29-33</u>	No	<u>See DR SOCIO-1 to DR SOCIO-6 See REV 1 DR SOCIO-1, REV 1 DR SOCIO-2, and REV 1 DR SOCIO-3</u>

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 01 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (7) (A)	A description of the socioeconomic circumstances of the vicinity and region affected by construction and operation of the project. Include:	Subsection 4.10.1, pp. 4.10-1 to 4.10-41	No	See DR SOCIO-1 to DR SOCIO-6 <u>See REV 1 DR SOCIO-1</u>
Appendix B (g) (7) (A) (i)	The economic characteristics, including the economic base, fiscal resources, and a list of the applicable local agencies with taxing powers and their most recent and projected revenues;	Subsection 4.10.1, p. 4.10-6, p. 4.10-9; p.4.10-11, Table 4.10-1, p. 4.10-8, Table 4.10-2, p. 4.10-10; <u>Response Set #1 Part 1 (TN 257953), subsection 9.1, p. 29</u>	No	See DR SOCIO-1 <u>See REV 1 DR SOCIO-1</u>
Appendix B (g) (7) (A) (ii)	The social characteristics, including population and demographic and community trends;	Subsection 4.10, pp. 4.10-1 to 4.10-5, pp. 4.10-31 to 4.10-41, Figure 4.10-1, p. 4.10-2, Figure 4.10-2, p. 4.10-2, Figure 4.10-3, p. 4.10-3, Figure 4.10-4, p. 4.10-4, Figure 4.10-5, p. 5.10-5, Figure 4.10-6, p. 4.10-5, Table 4.10-18, p. 4.10-32, Figure 4.10-25, p. 4.10-33, Table 4.10-19, pp. 4.10-35 to 4.10-36, Table 4.10-20, p. 4.10-36, Figure 4.10-26, p. 4.10-37, Figure 4.10-27, p.	No <u>Yes</u>	See DR SOCIO-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: June 2025

~~March 28, 2024~~

Technical Area: **Socioeconomics**

Project: Perkins Renewable Energy Project

Technical Staff: Lisa Harmon

Project Manager: Lisa Worrall/~~Ann Crisp~~

Docket: 24-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		4.10-38, Figure 4.10-28, p. 4.10-39, Table 4.10-21, p. 4.10-40, Table 4. 10-22, p. 4.10-41; <u>Response Set #1 Part 2 (TN 257952), Attachment H, Subsection 4.10, pp. 4.10-1 to 4.10-5, pp. 4.10-31 to 4.10-41, Figure 4.10-1, p. 4.10-2, Figure 4.10-2, p. 4.10-2, Figure 4.10-3, p. 4.10-3, Figure 4.10-4, p. 4.10-4, Figure 4.10-5, p. 5.10-5, Figure 4.10-6, p. 4.10-5, Table 4.10-18, p. 4.10-32, Figure 4.10-25, p. 4.10-33, Table 4.10-19, pp. 4.10-35 to 4.10-36, Table 4.10-20, p. 4.10-36, Figure 4.10-26, p. 4.10-37, Figure 4.10-27, p. 4.10-38, Figure 4.10-28, p. 4.10-39, Table 4.10-21, p. 4.10-40, Table 4. 10-22, p. 4.10-41</u>		
Appendix B (g) (7) (A) (iii)	Existing and projected unemployment rates;	Subsection 4.10.1, pp. 4.10-6 to 4.10-10, Table 4.10-7, p. 4.10-6, Table 4.10-8, p. 4.10-7, Table 4.10-10, p. 4.10-9, Table	No <u>Yes</u>	See DR SOCIO-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 01 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		4.10-11, p. 4.10-9; Response Set 1, Section 9.3		
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by occupation required for construction and operation of the project;	Subsection 4.10.2, pp. 4.10-44 to 4.10-46	Yes	
Appendix B (g) (7) (A) (v)	Availability of temporary and permanent housing and current vacancy rate; and	Subsection 4.10.1, pp. 4.10-12 to 4.10-24, Figure 4.10-13, p. 4.10-12, Table 4.10-3, p. 4.10-13, Figure 4.10-14, p. 4.10-13; Table 4.10-4, p. 4.10-14, Figure 4.10-15, p. 4.10-15, Table 4.10-5, p. 4.10-15, Figure 4.10-16, p. 4.10-16, Table 4.10-6, p. 4.10-16	Yes	
Appendix B (g) (7) (A) (vi)	Capacities, service standards, existing and expected use levels, and planned expansion of utilities (gas, water, and waste) and public services, including fire protection, law enforcement, emergency response, medical facilities, other assessment districts, school districts, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information for each school district shall include current enrollment and yearly expected enrollment by grade level groupings,	Subsection 4.10.1, pp. 4.10-24 to 4.10-31; Table 4.10-9, pp. 4.10-24 to 4.10-25, Table 4.10-10, p. 4.10-25, Table 4.10-11, p. 4.10-25, Table 4.10-12, p. 4.10-27, Table 4.10-13, p. 4.10-28, Table 4.10-14, p. 4.10-28, Table 4.10-15, p. 4.10-28, Table 4.10-16, p. 5.10-29, Table 4.10-17, p. 4.10-30	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 01 Date: March 28, 2024
 Technical Area: **Socioeconomics** Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	excluding project-related changes for the duration of the project schedule.			
Appendix B (g) (7) (B)	A discussion of the socioeconomic impacts caused by the construction and operation of the project (note year of estimate, model, if used, and appropriate sources), including:	Subsection 4.10.2, pp. 4.10-41 to 4.10-72	Yes	
Appendix B (g) (7) (B) (i)	An estimate of the number of workers to be employed each month by occupation during construction, and for operations, an estimate of the number of permanent operations workers during a year;	Subsection 4.10.2, pp. 4.10-44 to 4.10-46	Yes	
Appendix B (g) (7) (B) (ii)	An estimate of the percentage of non-local workers who will relocate to the project area to work during the project construction and operation;	Subsection 4.10.2, pp. 4.10-46 to 4.10-48	Yes	
Appendix B (g) (7) (B) (iii)	An estimate of the potential population increase caused directly and indirectly by the project;	Subsection 4.10.2, pp. 4.10-46 to 4.10-48	Yes	
Appendix B (g) (7) (B) (iv)	The potential impact of population increase on housing during the construction and operations phases;	Subsection 4.10.2, pp. 4.10-46 to 4.10-48	Yes	
Appendix B (g) (7) (B) (v)	The potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste) and public	Subsection 4.10.2, pp. 4.10-48 to 4.10-5, pp. 4.10-62 to 4.10-65	Yes	

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 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information on schools shall include project-related enrollment changes by grade level groupings and associated facility and staffing impacts by school district during the construction and operating -phases;			
Appendix B (g) (7) (B) (vi)	An estimate of applicable school impact fees;	Subsection 4.10; <u>Response Set #1 Part 2 (TN 257952), Attachment H, Subsection 4.10.1, p. 4.10-29</u>	No <u>Yes</u>	See DR-SOCIO-4
Appendix B (g) (7) (B) (vii)	An estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees;	Subsection 4.10.2, pp. 4.10-52 to 4.10-56, Table 4.10-23, p. 4.10-52T Table 4.10-24, p. 4.10-53, Table 4.10-25, p. 4.10-53 Table 4.10-29, p. 4.10-56, Table 4.10-30, p. 4.10-56 Table 4.10-31, p. 4.10-56; <u>Response Set #1 Part 2 (TN</u>	No <u>Yes</u>	See DR-SOCIO-5

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 01 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		<u>257952), Attachment H, Subsection 4.10.2, pp. 4.10-52 to 4.10-56, Table 4.10-24, p. 4.10-53, Table 4.10-25, p. 4.10-53 Table 4.10-31, p. 4.10-56</u>		
Appendix B (g) (7) (B) (viii)	An estimate of the expenditures for locally purchased materials for the construction and operation phases of the project;	Subsection 4.10.2, pp. 4.10-52 to 4.10-56, Table 4.10-23, p. 4.10-52, Table 4.10-24, p. 4.10-53, Table 4.10-25, p. 4.10-53 Table 4.10-29, p. 4.10-56, Table 4.10-30, p. 4.10-56 Table 4.10-31, p. 4.10-56; <u>Response Set #1 Part 2 (TN 257952), Attachment H, Subsection 4.10.2, pp. 4.10-52 to 4.10-56, Table 4.10-23, p. 4.10-52, Table 4.10-24, p. 4.10-53, Table 4.10-25, p. 4.10-53</u>	No <u>Yes</u>	See DR-SOCIO-5
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost (plant and equipment) of the project;	Subsection 4.10.2, pp. 4.10-52 to 4.10-53, Table 4.10-23, p. 4.10-52, Table 4.10-24, p. 4.10-53, Table 4.10-25, p. 4.10-53; <u>Response Set #1 Part 2 (TN 257952), Attachment H, Subsection 4.10.2, pp.</u>	No <u>Yes</u>	See DR-SOCIO-5

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 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
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SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		<u>4.10-52 to 4.10-53, Table 4 4.10-23, p. 4.10-52</u>		
Appendix B (g) (7) (B) (x)	An estimate of sales taxes generated during construction and separately during an operational year of the project;	Subsection 4.10.2, pp. 4.10-58 to 4.10-62, Table 4.10-34, p. 4.10-59, Table 4.10-36, p. 4.10-61; <u>Response Set #1 Part 2 (TN 257952), Attachment H, Subsection 4.10.2, pp. 4.10-58 to 4.10-62, Table 4.10-34, p. 4.10-59, Table 4.10-36, p. 4.10-61</u>	No <u>Yes</u>	See DR SOCIO-5
Appendix B (g) (7) (B) (xi)	An estimate of property taxes generated during an operational year of the project;	Subsection 4.10.2, pp. 4.10-59 to 4. 10-60; <u>Response Set #1 Part 2 (TN 257952), Attachment H, Subsection 4.10.2, pp. 4.10-59 to 4. 10-60, Table 4.10-35, p. 4.10-60.</u>	No <u>Yes</u>	See DR SOCIO-5, DR SOCIO-6
Appendix B (g) (7) (B) (xii)	The expected direct, indirect, and induced income and employment effects due to construction and operation of the project; and	Subsection 4.10.2, pp. 4.10-52 to 4.10-58, Table 4.10-28, p. 4.10-55; Table 4.10-31, p. 4.10-56; <u>Response Set #1 Part 2 (TN 257952), Attachment H, Subsection 4.10.2, pp. 4.10-52 to 4.10-58, Table 4.10-28, p. 4.10-55; Table 4.10-31, p. 4.10-56</u>	No <u>Yes</u>	See DR SOCIO-5

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 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
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SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (7) (B) (xiii)	A discussion of impacts to environmental justice populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations.	Subsection 4.10.2, pp. 4.10-67 to 4.10-72	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 4.10.5, pp. 4.10-75 to 4.10-77, Table 4.10-38, pp. 4.10-75 to 4.10-76, Table 4.10-39, p. 4.10-76, Table 4.10-40, p. 4.10-77; <u>Response Set #1 Part 2 (TN 257952), Attachment H, Subsection 4.10.5, pp. 4.10-75 to 4.10-77, Table 4.10-38, pp. 4.10-75 to 4.10-76, Table 4.10-39, p. 4.10-76, Table 4.10-40, p. 4.10-77</u>	No <u>Yes</u>	See DR SOCIO-7
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive	Subsection 4.10.6, p. 4.10-77; Appendix E, Table E.2	Yes	

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 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 4.10.6, p. 4.10-77; Appendix E.1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

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Revision No. 01 Date: March 28, 2024

July 2025

Technical Area: **Traffic and Transportation**

Project: Perkins Renewable Energy Project

Technical Staff: Chuck Huffine

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 4.12, Subsection 4.12.2, pp. 4.12-11 to 4.12-25	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.12, Subsections 4.12.1 – 4.12.7, pp. 4.12-1 to 4.12-28	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.12, Subsection 4.12.7, pp. 4.12-27 to 4.12-28	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Section 4.12, Subsections 4.12.1 to 4.12.4, pp. 4.12-1 to 4.12-25	Yes	

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Completeness: Complete ☐ Incomplete ☒ **Traffic and Transportation**
 Technical Area: **Traffic and Transportation** Project: Perkins Renewable Energy Project Revision No. 01 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: Chuck Huffine
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (5) (A)	A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan.	Section 4.12, Subsection 4.12.1, pp. 4.12-1 to 4.12-7	Yes	
Appendix B (g) (5) (B)	If the proposed project including any linear facility is to be located within four miles of an airport, a planned or proposed airport runway, or an airport runway under construction, discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace, specifically any potential to obstruct or impede air navigation generated by the project during construction or operation; such as, a thermal plume, a visible water vapor plume, glare,	Section 4.12, Subsection 4.12.1, p. 4.12-9	Yes	

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Completeness: Complete Incomplete x

Revision No. 01 Date:

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Technical Area: **Traffic and Transportation**

Project: Perkins Renewable Energy Project

Technical Staff: Chuck Huffine

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	electrical interference, or surface structure height. The discussion should include:			
Appendix B (g) (5) (B) (i)	A map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the airport influence area including all safety zones, and the proposed power plant site and related facilities.	N/A	N/A	N/A
Appendix B (g) (5) (B) (ii)	A thermal plume analysis that describes the plume's velocity;	N/A	N/A	N/A
Appendix B (g) (5) (B) (iii)	A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and	N/A	N/A	N/A
Appendix B (g) (5) (B) (iv)	Copies of FAA Form 7460-1, Notice of Proposed Construction or Alteration, that were submitted or approved for any project component requiring notice.	N/A	N/A	N/A
Appendix B (g) (5) (C)	An evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include:	--	--	--
Appendix B (g) (5) (C) (i)	The local jurisdiction's thresholds of significance;	Section 4.12, Subsection 4.12.2, p. 4.12-16	Yes	
Appendix B (g) (5) (C) (ii)	Methodologies (such as local VMT Evaluation Tool);	Section 4.12, Subsection 4.12.2, pp. 4.12-12 to 4.12-17; Data Request	No Yes	See DR-TRANS-1

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Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: March 28, 2024

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Technical Area: **Traffic and Transportation**

Project: Perkins Renewable Energy Project

Technical Staff: Chuck Huffine

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		<u>Response Set #1, Part 1, TN 257953, pp. 48 to 49</u>		
Appendix B (g) (5) (C) (iii)	VMT heat maps; and	Section 4.12, Subsection 4.12.2, pp. 4.12-16 to 4.12-17; <u>Data Request Response Set #1, Part 1, TN 257953, pp. 48 to 49</u>	No <u>Yes</u>	See DR TRANS-1
Appendix B (g) (5) (C) (iv)	Transportation demand management plans and any documents supporting the project applicant's CEQA determination.	Section 4.12, Subsection 4.12.4, p. 4.12-25; <u>Data Request Response Set #1, Part 1, TN 257953, pp. 48 to 49</u>	No <u>Yes</u>	See DR TRANS-1
Appendix B (g) (5) (D)	An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area affected by or serving the proposed facility. For each road identified, include the following, where applicable:	--	--	--
Appendix B (g) (5) (D) (i)	Road classification and design capacity;	Section 4.12, Subsection 4.12.1, pp. 4.12-1 to 4.12-8	Yes	

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Completeness: Complete Incomplete **x**

Revision No. **01** Date: March 28, 2024

March 28, 2024

July 2025

Technical Area: **Traffic and**

Transportation

Project: Perkins Renewable Energy Project

Technical Staff: Chuck Huffine

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (5) (D) (ii)	Current daily average and peak traffic counts;	Section 4.12, Subsection 4.12.1, p. 4.12-10; Appendix T	Yes	
Appendix B (g) (5) (D) (iii)	Current and projected levels of service before project development, during construction, and during project operation;	Section 4.12, Subsection 4.12.1, p. 4.12-10, pp. 4.12-12, 4.12-17; Appendix T	Yes	
Appendix B (g) (5) (D) (iv)	Weight and load limitations;	Section 4.12, Subsection 4.12.1, pp. 4.12-10 to 4.12-11	Yes	
Appendix B (g) (5) (D) (v)	Estimated percentage of current traffic flows for passenger vehicles and trucks; and	Section 4.12, Subsection 4.12.1, p. 4.12-10; Appendix T	Yes	
Appendix B (g) (5) (D) (vi)	An identification of any road features affecting public safety.	Section 4.12, Subsection 4.12.3, p. 4.12-24	Yes	
Appendix B (g) (5) (E)	An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(D). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(D). Include:	Section 4.12, Subsection 4.12.3, p. 4.12-24; <u>Data Request Response Set #1, Part 1, TN 257953, pp. 49 to 50</u>	No Yes	See DR TRANS-2
Appendix B (g) (5) (E) (i)	Estimated one-way trip lengths for workers, deliveries, and truck haul	Section 4.12, Subsection 4.12.2, pp. 4.12-16 to 4.12-	No Yes	See DR TRANS-3

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 Technical Area: **Traffic and Transportation** Project: Perkins Renewable Energy Project Revision No. 01 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: Chuck Huffine
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	trips generated by the construction of the project.	20; Data Request <u>Response Set #1, Part 1, TN 257953, p. 50; Data Request Response Set #1, Part 2, TN TN257952, pp. 91 to 100</u>		
Appendix B (g) (5) (E) (ii)	Description of public roadways and intersections temporarily or permanently altered by construction and operation including the duration of activities.	Section 4.12, Subsection 4.12.2, pp. 4.12-11 to 4.12-25; <u>Data Request Response Set #1, Part 1, TN 257953, p. 51</u>	No	See DR TRANS-4 <u>See REV 1 DR TRANS-1 and REV 1 DR TRANS-2</u>
Appendix B (g) (5) (F)	A discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.	Section 4.12, Subsection 4.12.2, pp. 4.12-21 to 4.12-23; <u>Data Request Response Set #1, Part 1, TN 257953, pp. 26-29 and 51 to 52</u>	No <u>Yes</u>	See DR TRANS-5
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or	Section 4.12, Subsection 4.12.5, pp. 4.12-26 to 4.12-27	Yes	

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Completeness: Complete ☐ Incomplete ☒ **Traffic and Transportation**
 Technical Area: **Traffic and Transportation** Project: Perkins Renewable Energy Project Revision No. 01 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: Chuck Huffine
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 4.12, Subsection 4.12.6, p. 4.12-27; Appendix E.1; <u>Data Request Response Set #1, Part 1, 257953, p. 52</u>	No <u>Yes</u>	See DR-TRANS-6
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 4.12, Subsection 4.12.6, p. 4.12-27; Appendix E.1; <u>Data Request Response Set #1, Part 1, TN 257953, p. 52</u>	No <u>Yes</u>	See DR-TRANS-6
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 4.12, Subsection 4.12.6, p. 4.12-27; Appendix E.2	Yes	

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Completeness: Complete ☐ Incomplete ☒ **x**
 Technical Area: **Worker Safety** Project: Perkins Renewable Energy Project Revision No. 01 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: Alvin Greenberg
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.17.2, p. 4.17-2, Tables 4.17.1 and 4.17.2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Subsection 4.17.7, p. 4.17-26	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or	Subsection 4.17.2, p. 4.17-5 to 4.17-16	Yes	

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 Technical Area: Worker Safety Project: Perkins Renewable Energy Project Technical Staff: Alvin Greenberg
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (11) (A)	A description of the safety training programs that will be required for construction and operation personnel.	Subsection 4.17.2, pp. 4.17-10 to 4.17-16, Table 4.17-4, p. 4.17-4 <u>Data Request Response Set #1, TN 258953, Section 12.1 pp. 44 to 47</u>	No <u>Yes</u>	See DR WS-1
Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.	Subsection 4.17.2, pp. 4.17-19 <u>Data Request Response Set #1, TN 258953, Section 12.3 p. 48</u>	No	See DR WS-3 <u>See REV 1 DR WS-1</u>
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	Subsection 4.17.2, p. 4.17-11 to 4.17-16 <u>Data Request Response Set #1, TN 258953, Section 12.1</u>	No <u>Yes</u>	See DR WS-1 to DR WS-5
	Construction Health and Safety Program: Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);	Subsection 4.17.2, p. 4.17-11 to 4.17-12 <u>Data Request Response Set #1, TN 258953, Section 12.1</u>	No <u>Yes</u>	See DR WS-1 to DR WS-5

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Completeness: Complete ☐ Incomplete ☒ Revision No. 01 Date: March 28, 2024
 Technical Area: Worker Safety Technical Staff: Alvin Greenberg
 Project Manager: Lisa Worrall/Ann Crisp Technical Senior: Brett Fooks
 Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920);	Subsection 4.17.2, p. 4.17-12 <u>Data Request Response Set #1, TN 258953, Section 12.1</u>	No	See DR WS-3 and WS-5 <u>REV 1 DR WS-2</u>
	Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522)	Subsection 4.17.2, p. 4.13-11	Yes	
	Operation Health and Safety Program: Injury and Illness Prevention Program (8 Cal. Code Regs., §3203);	Subsection 4.17.2, p. 4.17-13 to 4.17-16 <u>Data Request Response Set #1, TN 258953, Section 12.1 p. 44</u>	No <u>Yes</u>	See DR WS-1 and WS-2
	Fire Prevention Plan (8 Cal. Code Regs., § 3221);	Subsection 4.17.2, p. 4.17-1 <u>Data Request Response Set #1, TN 258953, Section 12.1</u>	No <u>Yes</u>	See DR WS-3 and WS-5
	Emergency Action Plan (8 Cal. Code Regs., § 3220);	Subsection 4.17.2, p. 4.17-16	Yes	
	Personal Protective Equipment Program (8 Cal. Code Regs., §§3401-3411).	Subsection 4.17.2 p. 4.17-15	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a	Table 4.17-5, p. 4.17-20	Yes	

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Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Worker Safety** Project: Perkins Renewable Energy Project Revision No. 01 Date: March 28, 2024 **July 2025**
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: Alvin Greenberg
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix E2, pp. 1-4	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E1, pp. 1-3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 01 Date: March 28, 2024
Technical Area: Worker Safety Project: Perkins Renewable Energy Project Technical Staff: Alvin Greenberg
Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	plans to take to obtain such permits.			

Attachment B

REV 1 Data Requests

Attachment B Revision 1 Data Requests

AIR QUALITY

In response to an Imperial County Air Pollution Control District (ICAPCD) request to revise assumptions used in their CalEEMod construction calculations, the applicant completed an updated Air Quality Technical Report in December 2024 and submitted a copy to CEC staff. This updated Air Quality Technical Report supersedes the report submitted in Data Request Response Set #1 (TN 257953).

CEC staff confirmed that the AERSCREEN modeling analysis submitted in the previous Air Quality Technical Report uses emission rates that are consistent with those shown on page 130 of Data Request Response Set #1 (though as shown in the table below, the average daily construction emissions shown in Table 12 on page 115 of Data Request Response Set #1 are more conservative than those used in the AERSCREEN modeling analysis). However, the estimated PM10 and PM2.5 emissions in the updated Air Quality Technical Report (December 2024 version) are higher than those used in the AERSCREEN modeling analysis. An updated AERSCREEN modeling analysis was not included as part of the report submittal. CEC staff needs an updated modeling analysis that incorporates the revised emission rates contained in the updated Air Quality Technical report to confirm that project construction emissions would not cause a violation of applicable ambient air quality standards and that no sensitive receptors would be exposed to significant criteria pollutant concentrations.

AVERAGE DAILY CONSTRUCTION EMISSIONS FOR CRITERIA AIR POLLUTANTS (POUNDS PER DAY)						
	ROG	NOx	CO	SO₂	PM10	PM2.5
Page 130 of 320 (TN 257953), Used in AERSCREEN	8.38	66.45	207.09	0.34	233.28	25.79
Table 12 on page 115 of 320 (TN 257953)	11.8	93.3	290.7	-	327.5	-
Updated Air Quality Study (December 2024)	8.3	63.8	197.9	0.2	420.4	48.2
ICAPCD Thresholds	75	100	550	-	150	-

REV 1 DR AQ-1. Please provide an updated AERSCREEN modeling analysis using the revised emission rates consistent with the updated Air Quality Technical Report.

CEC staff reviewed the applicant's AERSCREEN modeling results at the nearest sensitive receptor presented in Table 14 on page 118 of 320 of the Data Request Response Set #1 (TN 257953) in response to staff's DR AQ-8. Table 14 shows that the 24-hour and annual PM10 impacts during construction would be 15.79 µg/m³, which exceed the 24-hour and annual PM10 significant impact levels (SILs) of 5.0 µg/m³ and 1.0 µg/m³ respectively. Table 14 also shows that the 24-hour and annual PM2.5 impacts during construction would be 1.75 µg/m³, which exceed the 24-hour and annual PM2.5 SILs of

1.2 µg/m³ and 0.13 µg/m³ respectively. Table 14 also shows the annual impacts of 0.002 ppm for NO₂ during construction would exceed the annual NO₂ SIL of 0.0005 ppm. The results from AERSCREEN, as shown in Table 14, indicate that the project construction may expose sensitive receptors to substantial concentrations of PM₁₀, PM_{2.5}, and annual NO₂. However, CEC staff understands that impacts modeled with AERSCREEN are conservative. According to the U.S. EPA 2017 Guideline on Air Quality Models¹, if the ambient concentration estimates from a screening model indicate that the source's emissions have the potential to cause or contribute to a violation, then the use of a refined model to estimate the source's impact should be pursued.

REV 1 DR AQ-2. Please provide a refined ambient air quality impacts analysis using AERMOD for 24-hour and annual PM₁₀ and PM_{2.5} impacts, and annual NO₂ impacts during construction with the revised emission rates discussed above. If results from the revised AERSCREEN modeling analysis requested in **REV 1 DR AQ-1** show any new exceedance of SILs for other pollutants or averaging period, please provide a refined ambient air quality impacts analysis using AERMOD for these pollutants and averaging periods as well.

In Data Request AQ-2, CEC staff requested that the applicant provide a completeness determination letter from the ICAPCD confirming that the application submitted to the District has been deemed complete. The CEC staff has reviewed the applicant's response to DR AQ-2 in Data Request Response Set #1, Part 1, TN 257953, and still require that the applicant submit the previously requested completeness letter from the ICAPCD.

REV 1 DR AQ-3. Please provide a completeness determination letter from the ICAPCD confirming that the application submitted to the District have been deemed complete.

BIOLOGICAL RESOURCES

NOTE: For all relevant items below, please provide both a strikethrough and clean version of all changes to the documents, including referenced documents, when resubmitting.

The Data Request Response to DR BIO-3d references desert dry wash woodland on Figure 16 (Aquatic Resources Map 8) identified during surveys on private lands and that the woodland would be avoided by the project with a 200-foot buffer (except for minor incursions as described in the Desert Renewable Energy Conservation Plan (DRECP) Land Use Planning Amendment (LUPA), which would also protect both washes and most of the swale. Applicant has noted that any impacts to jurisdictional waters will be described in subsequent data responses.

REV 1 DR BIO-1. Please update Aquatic Resources Map 8 to identify area of

¹ Available online at: https://www.epa.gov/sites/default/files/2020-09/documents/appw_17.pdf

avoidance. Please provide an analysis of all foreseeable impacts to jurisdictional waters for data completeness. Please provide the description of any impacts to jurisdictional waters that was noted would be provided in subsequent data responses. See **REV 1 DR BIO-3**.

The Data Request Response to DR BIO-3i included updated GIS shapefiles to depict the updated areas subject to California Department of Fish and Wildlife (CDFW) jurisdiction and the mapped hydrology; however, the GIS data "Perkins_JD_Net_Label" does not include metadata explaining what the labels or original Field Identification (FID) correspond with in the reports.

REV 1 DR BIO-2. Please provide the associated metadata for "Perkins_JD_Net_Label". Please ensure that the metadata for all other GIS files applicable to the Lake and Streambed Alteration Agreement (LSAA) or California Endangered Species Act (CESA) permitting is included. Please include a field correlating the date of the GIS data and the date/version of the impact tables within corresponding reports or permit applications.

The Data Request Response to DR BIO-3j states the description of the project activities included in the LSAA was limited to those activities that occur in areas containing 1600 jurisdictional resources, including riparian vegetation. The response further states the description has been updated to include work associated with the loop-in line poles and access road. However, staff requires all impacts occurring within the revised mapped areas to be identified by each individual "streambed alteration agreement project" which is not the same as the project description for the whole project, rather it is the individual action affecting the stream resources.

REV 1 DR BIO-3. Staff has the following requests:

- Please update the descriptions provided in the project description to describe the types of, or if, activities that would occur within a stream-for example, solar array installation involves pile driving (steel pipes, H-beams, etc.) but does not specifically discuss if trenching would occur within stream resources (it states that panel strings would be secured to racking systems).
- Similarly, Table 11A Project Impacts states that the 34.5kV collection cables would be installed below grade in a 4-6 foot trench, or via horizontal directional drilling (HDD). Please elaborate if or where HDD would be used to avoid stream resources. For HDD and all other impacts to streams (e.g., trenching) please identify the layout and trench lines that would cross stream resources.
- Please update Table 2 *Permanent Impact to Waters of the State-Bank to Bank* to distinguish the above information.
- Please also provide updated mapping of a scale sufficiently detailed (e.g. 1:300 similar to the aquatic resources report) to reflect stream resources and types of impacts (grading, pile driving, trenching, HDD, etc.)

- Please clarify or consolidate the project impact acreages provided in 11A Tables 3 and 4. Impact tables should discuss and identify both permanent and temporary impacts to stream resources.
- Please provide an overview figure and large-scale figures (approx. 1:300 scale) indicating the stream features within the project site and a delineation of each of the streambed alteration agreement “project” impacts (footprint) within the stream features that are requested for coverage pursuant to the LSAA, under the CEC’s in-lieu permitting authority. Please be certain to visually distinguish between the types of applicable impacts (e.g., grading, pile driving, cement, rip rap, and permanent vs. temporary impacts, etc.). Please also include updated GIS layer(s) with this information.

The Data Request Response to DR BIO-3I states that the Aquatic Resources Report (ARR) was updated to include additional information on the approach to delineate waters and that areas lacking indicators of water resources were not mapped as water resources. It is unclear to staff if the LSAA impact acreages is comprehensive and includes all potential impacts such as photovoltaic (PV) panels, piers, collectors, and other appurtenant infrastructure occurring within these areas, which need to be identified as an impact to stream resources.

REV 1 DR BIO-4. Please clarify if the LSAA impacted acreages include PV panels, collectors, and other appurtenant infrastructure occurring within these areas.

The Data Request Response to DR BIO-27b indicated a revised LSAA notification and Waste Discharge Requirements (WDR) application were provided. The tables from (TN 262219) do not match the acreages listed in Appendix J.5 Mitigation Lands Outline (TN 254469). In previous communications, staff requested the applicant to update the project’s stream resource mapping to include areas that are referenced as “CDFW jurisdictional vegetation” based on the CDFW engineer’s review of hydrology, modeling, and assertion that these streams do not lack connectivity, rather that the stream’s expression may become slight of obscured which led staff to request an updated ARR. This stream connectivity (based on the updated ARR) should be identified in the LSAA and project activities (pursuant to LSAA application section 11) should be identified based on this understanding.

REV 1 DR BIO-5. Please provide revised tables and figures to ensure all documents reflect the accurate impact acreages based on the updated AAR addendum. When resubmitting, please ensure the figures are visible and not cropped in the redline version.

The Data Request Response to DR BIO-7 provided resumes for most biologists that conducted biological resource surveys; however, resumes for T. Cole and T. Silvia for burrowing owl surveys, K. Brennan for bat surveys and Michele Cloud-Hughes and Nathan Gross for aquatic surveys were not submitted.

Field survey forms were requested as part of DR BIO-7, however the applicant's response was, "raw data from the field survey forms can be provided if needed." Staff is requesting the field survey forms for desert kit fox and for all breeding and non-breeding burrowing owl surveys conducted in 2023 through 2025. Survey forms are necessary for staff to understand what data was collected, what was not and how the data was interpreted and conveyed. Staff need to evaluate whether or not the baseline environmental conditions were adequately described. This information is necessary for the mitigation strategy and ensuring the species is mitigated appropriately.

In addition, the mapping provided that includes the mammal GIS layer includes some desert kit fox burrow information in the comments section; however, staff would like to see additional details for each identified burrow.

REV 1 DR BIO-6. Please provide the following:

- Resumes for T. Cole, T. Silvia, K. Brennan, M. Cloud-Hughes and Nathan Gross.
- Field survey forms for desert kit fox and burrowing owl protocol surveys conducted in 2023 through 2025. Field survey forms should follow survey report recommendations in the Staff Report on Burrowing Owl Mitigation (CDFW 2012) Appendix D and include timing of surveys, weather conditions, surveyor(s) qualifications, color photos, observational descriptions including individual markers (e.g., bands, transmitters, or unique identifying features), a description of the owl's behavior, coordinate locations for observation, and copies of any California Natural Diversity Database (CNDDDB) Field Survey Forms submitted to the CDFW CNDDDB office.
- A narrative of the methods used during the surveys which is responsive to the report outline provided in CDFW's 2012 Burrowing Owl Staff Report, Appendix D.
- Please clarify if the mammal GIS layer includes all field data collected, if not, please provide additional details on desert kit fox burrows in the comments section of the mammal GIS layer, including but not limited to state of use (e.g., potential den, known den, potential natal/pupping dens-include observations supporting determination), size, incidental sign observations (e.g. tracks, scat, prey remains), mapping of potential prey (e.g., ground squirrel colonies), and provide photos.

The Data Request Response to DR BIO-20 included updates to the application to address burrowing owls and included Incidental Take Permit (ITP) applications for take coverage. Further information is being requested regarding the two burrowing owl carcasses observed. Staff and CDFW would like further information such as the disposition of the dead individuals

REV 1 DR BIO-7. Please provide a brief explanation of the disposition of the two dead burrowing owls, including coordinates of sign, descriptors (e.g., recent or old, feather, decorations, pellets, etc.), field notes, and photos, if available.

Due to the close proximity of the All-American Canal and occupied habitat within 0.3 miles of the project site, staff are aware of the request by Bureau of Land Management (BLM) and United States Fish and Wildlife (USFWS) for the applicant to conduct Yuma Ridgway's rail (*Rallus obsoletus yumanensis*) protocol surveys. Staff would also like the applicant to provide further data on the California black rail (*Laterallus jamaicensis coturniculus*). Please address migration and dispersal patterns and the potential for rails to utilize communities within and adjacent to the project site. If take of California black rail is anticipated, staff recommends seeking take authorization for this species under the CEC's in lieu permitting authority.

REV 1 DR BIO-8. Please update the Biological Resources Technical Report (BRTR) and LSAA with results of the protocol level surveys, impacts analysis (including loss of foraging habitat, as applicable) and include any avoidance, minimization and/or mitigation measures necessary to fully address potential impacts to the species (i.e. Yuma Ridgway's rail and California black rail). Please provide both a strikethrough and clean version of all changes to the documents, including referenced documents, when resubmitting. Please incorporate any avoidance measures into the appropriate management plans.

Alternatively, if take of California black rail is anticipated, and the applicant is choosing to seek take authorization for this species under the CEC's in lieu permitting authority. Please provide all information that would be required in an ITP application for CESA-listed or candidate species, specifically, California black rail. Information on what is requested in a typical ITP application can be located here: <https://wildlife.ca.gov/Conservation/CESA/Permitting/Incidental-Take-Permits>

REV 1 DR BIO-9. Please provide an updated Section 4.2 Biological Resources impact analysis with the addition of 2024 survey data. Please provide redline version of an updated Section 4.2 impact analysis for biological resources and update figures as necessary to include 2024 data.

The Data Request Response to DR BIO-23c included a table that identified impacts by vegetation type; however, the impacts table should also include by species, and resources, and those areas avoided similar to Table 2 provided in the response but comprehensively. Appropriate mitigation needs to be evaluated under CESA not just through the DRECP lens.

REV 1 DR BIO-10. Please provide a comprehensive table that includes species, resource impacts, avoidance and measures to offset impacts.

The Data Request Response to DR BIO-23c regarding mitigation ratios was not adequately addressed. Staff need to understand what areas are considered permanent (long-term) vs. Temporarily (short-term) impacted, what impacts are being mitigated (e.g., desert wash, flat-tailed horned lizard (FTHL), vegetation communities, etc.). It may be appropriate to mitigate multiple impacts (e.g. certain vegetation communities

that also contain stream resources) at one location; however, a table with each impact and corresponding mitigation requirement needs to be provided.

REV 1 DR BIO-11. Please provide an updated table reflecting permanent and/or temporary impacts with associated mitigation ratios for each impact and corresponding mitigation requirement.

REV 1 DR BIO-12. The Data Request Response to DR BIO-25 includes supplemental compensatory information for impacts to FTHL; however, staff still need clarification on the following issues:

- Please provide an analysis of the proposed mitigation lands suitability for offsetting project impacts. The analysis shall compare the species' occupancy and densities between the impact and mitigation sites. The analysis shall support a conclusion that the proposed mitigation is biologically equivalent or superior to the area of impact.
 - The proposed mitigation conservation analysis should include an analysis of the population densities of FTHL between the Perkins site and all proposed mitigation sites. For example, the abundance of harvester ants between the Perkins site and the mitigation sites should be analyzed to support a biologically equivalent or superior determination.
- Please state how the compensatory mitigation currently underway with mitigation partner, Wildlands, is adequate for the impact to the high-quality habitat for the species.
 - 477 of the proposed 6,000-acres of mitigation (approximately 8 percent) of the mitigation obligation has been identified for conservation. Given the high density of FTHL and acreage at the Perkins site, CDFW does not recommend conversion to monetary replacement (see FTHL Rangewide Management Strategy (RMS) p. 61).
- The Wildlands letter in Appendix J.6 does not provide any specific details – please provide specific details including the land selection process, performance requirements, schedule, and outline of the plan.
 - This appears to be in process per the mitigation conservation analysis document “[i]n addition to the parcels included in this analysis, land acquisition of the remaining approximately 5,523-acres of compensatory mitigation is being developed.

The Data Request Response to DR BIO-30 addressed sand transport; however, did not include a sand transport study, as no modeling or site-specific analysis was provided. Staff requests a more focused analysis of the impacts of aeolian sand processes in relation to the proposed project infrastructure. Specifically, staff would like the applicant to address potential impacts to aeolian sands along the proposed fence line.

REV 1 DR BIO-13. Please address the project impacts on aeolian sand transport along the fence line. Provide an analysis of the potential impacts to species that could occur in these areas due to impacts on aeolian sand transport. Include in the following in the sand transport study:

- Areas with active or potential sand movement, based on aerial imagery, field data, or soil maps.
- Description of sand features intersected by the fence alignment. Assessment of how the fence and other infrastructure may disrupt sand transport.
- Modeling of wind-driven sand movement including sand supply and transport rates using local wind, terrain, soil, precipitation, and localized soil moisture levels pre and post-project.
- Any proposed design measures (e.g., raised or permeable fencing) to maintain sand flow.

The revised figures submitted (eg. Figure 3, Attachment A) show a split through the project footprint identified in the legend as the IP Perkins Project Application Area.

REV 1 DR BIO-14. Please identify what this split represents or resubmit accurate figures. For example, Figure 3 in Attachment A, Supplemental Pages. Please provide an explanation of the split through the project footprint, or resubmit accurate figures.

The Incidental Take Permit (ITP) application submitted for the construction phase of the area contained within the IP Perkins breaker-and-a-half (BAAH) project boundary requests coverage for a period of two years, or the total of the project's construction phase. The incidental take authorization for the construction of this facility would be issued under the CEC's in-lieu permitting authority. According to ITP application upon completion of construction, ownership of the project facilities would be transferred to San Diego Gas & Electric (SDG&E). At that point, SDG&E would be responsible for obtaining authorization for incidental take of burrowing owl from CDFW for operation phase of the facility. The incidental take authorization for the operation of this facility would not fall under the CEC's in-lieu authority.

REV 1 DR BIO-15. Please coordinate with SDG&E to determine whether operation of the IP Perkins BAAH facility would need incidental take coverage for compliance under CESA. If it is anticipated that incidental take coverage would be requested, please provide proposed avoidance, minimization and mitigation measures that SDG&E would implement to ensure impacts to burrowing owls and their habitat are less than significant. Please provide the anticipated schedule for SDG&E to apply for take coverage and submit an ITP application to CDFW.

CULTURAL AND TRIBAL CULTURAL RESOURCES

REV 1 DR CUL/TRI-1. Previously, in DR CUL/TRI-4, the CEC staff requested a

missing page from resource record P-13-007130: Page 3 of Archeological Site Record YMP-66, PDF page 108, included in Appendix N.1, Cultural Record Search (confidential). Although the applicant states in Set #3 Response 3.5 that it provided the missing page in a confidential filing, the CEC staff found no resource record forms in the confidential filings.

REV 1 DR CUL/TRI-2. In DR CUL/TRI-5, the CEC staff noted that page 39 of the PDF file for the P-13-011261 site record form is in an editable format (see 20240220T152927_CONFIDENTIAL Cultural Resource DPR Forms Part 3 and requested confirmation that the information provided on this page is identical to the information contained on it at the time of receipt from the South Coastal Information Center and no changes were made to the form. The applicant indicated in Set #3 Response 3.6 that page 39 of the P-13-011261 PDF file been revised and uploaded to the CEC under request for confidentiality. The CEC staff found no resource record forms in the confidential filings.

REV DR CUL/TRI-3. The following previous cultural resource studies are cited in Section 4.3, Cultural Resources, Table 4.3-1, but copies of them are not included in the confidential cultural resources filings provided with the application. Please provide copies of these studies or explain why they do not need to be part of the application:

- a. Rayle, Christopher E., and Steve Swanson, 2017, IM-01678

REV DR CUL/TRI-15. No cultural and tribal cultural resources technical report is contained in Appendix N.2 to the application. Please provide this report.

GREENHOUSE GAS EMISSIONS (CLIMATE CHANGE)

The Engineering section of the application (p. 3-2) states that the operation and maintenance (O&M) building and the battery systems would require air conditioning, but the refrigerant to be used in those air conditioning systems is not specified and there are no estimates of refrigerant leakage. The application also does not demonstrate whether use of the refrigerant would comply with the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning and Other End-Uses (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10 on Climate Change, Article 4, Subarticle 5, Section 95374) or the sale and distribution prohibition timelines established in SB 1206 (Skinner, Chapter 884, Statutes of 2022; Health and Safety Code, Section 39735).

The applicant's response to **DR GHG-7** does discuss the GHG emissions associated with BESS cooling and states that the power loss from the BESS cooling system is included in the round-trip efficiency (RTE) value. However, GHG emissions resulting from refrigerant leakage from the BESS cooling system are not discussed or accounted for.

Staff needs this analysis to demonstrate that the project would not conflict with regulations adopted for the purpose of reducing emissions of greenhouse gases. In addition, staff needs clarification on the type of refrigerant that the air conditioning systems will use.

REV 1 DR GHG-1. Please provide the specifications of the refrigerant(s) to be used in the air conditioning systems proposed for the O&M building and the battery systems.

REV 1 DR GHG-2. Please explain how the use of the proposed refrigerant(s) would comply with the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning and Other End-Uses.

REV 1 DR GHG-3. Please explain how the proposed refrigerant(s) would comply with the sale and distribution prohibition timelines established in SB 1206 (2022).

REV 1 DR GHG-4. Please provide an estimate of the GHG emissions (in metric tons of carbon dioxide equivalent) expected from refrigerant leakage.

In response to **DR GHG-6**, the applicant provided loss in round-trip efficiency (RTE) on page 25 of 320 in the Data Request Response Set #1 (TN 257953). Staff needs to better understand the direct and indirect GHG emissions associated with the BESS. If grid power is used to charge the BESS, staff needs to know what the indirect GHG emissions are assuming some loss in RTE for charging/discharging and GHG emission intensity from the electrical grid during charging.

REV 1 DR GHG-5. If the BESS system would also be charged by the grid, calculate the indirect GHG emissions. Provide assumptions for the number of hours annually the BESS system could be charged by the grid, and the GHG emission intensity factor from the electrical grid during charging.

Appendix C of the Air Quality Technical Report (TN 254403) includes an estimate of the emissions avoided by producing electricity with the proposed project. The analysis in Appendix C compares the project emissions against emission reductions achieved by displacing conventional generation using a natural gas combined cycle power plant with duct firing and assumes that the type of generation displaced will remain static over the 30-year life of the project. However, natural gas power generation is projected to become less prominent in California's power mix as California's policies, most notably those enacted to reach the SB 100 (De León, Chapter 312, Statutes of 2018) goal of 100 percent renewable and zero-carbon electricity by 2045, decarbonize the electricity sector. Therefore, use of a static displacement factor for a power type currently being phased out through state policy overestimates the project's avoided GHG emissions and an update to the avoided GHG emissions analysis is needed.

REV 1 DR GHG-6. Please conduct an updated analysis of the amount of GHG emissions that would be avoided by the proposed project, taking into account the

declining statewide average emissions of California's power mix as the state reaches future SB 100 renewable and zero-carbon electricity goals.

HAZARDOUS MATERIALS HANDLING

REV1 DR HAZ-1. Table 4 in Data Response Set #1 lists sulfuric acid for battery cells and Table 5 lists 620 gallons of sulfuric acid. Please clarify if this is leftover from previous battery chemistries (such as lead-acid batteries) and confirm whether it can be removed.

Table 5 measures sulfur hexafluoride in gallons. Sulfur hexafluoride is not typically measured in gallons, as it is a gas and is typically not stored in a liquid state. Please revise this entry accordingly.

REV1 DR HAZ-2. The data request response to DR HAZ-3 in Data Request Set #1 introduced changes to the project description including the deletion of certain lithium-ion battery chemistries. To maintain consistency with the updated project description, please remove the following lithium-ion battery chemistries from Table 5: lithium nickel manganese cobalt and lithium nickel cobalt aluminum.

LAND USE

Appendix B requires a discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans and policies adopted by any federal, state, regional, or local planning agencies and shall. Identify the need, if any, for land use decisions by another public agency or as part of the CEC's Decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations (Appendix B, (g) (3) (B)). It also requires a description of the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and temporary laydown or staging area, will be located on a single legal parcel (Appendix (g) (3) (C)).

Response Set 1 (TN 257953), Section 5.4 response to DR LAND-4, states the applicant will prepare parcel merger, parcel map, or other applicable applications and proposed mapping that will be submitted to Imperial County to merge lots or otherwise adjust interior lot lines to facilitate project development.

REV 1 DR LAND-1. Provide the proposed parcel merger, parcel map, and other proposed mapping that will accompany applicable applications that will be submitted to Imperial County to merge lots or otherwise adjust interior lot lines to facilitate project development. Although the merger need not occur prior to a decision, provide a map of the proposed method and timetable for merging and combining

parcels.

PUBLIC HEALTH

Staff reviewed the applicant's response to staff's DR PH-2 with the applicant's AERSCREEN modeling results at the nearest sensitive receptor presented in Table 14 on page 118 of 320 of the Data Request Response Set #1 (TN 257953). Table 14 shows that the annual PM_{2.5} impacts would be 1.75 µg/m³ during construction and 0.08 µg/m³ during operation. Based on these results and the Risk Assessment Standalone Tool provided by the California Air Resources Board, staff estimated the cancer risks at the nearest sensitive receptor to be 599 in one million and 69.2 in one million during construction and operation respectively, which would exceed the significance threshold of 10 in one million adopted by many California air districts. Staff understands that the health risk impacts calculated based on AERSCREEN results are conservative. Staff needs results from a refined Health Risk Assessment (HRA) to determine whether the project impacts to public health would be less than significant.

REV 1 DR PH-1. Please provide a refined HRA of the project during construction and operation to demonstrate that the project impacts to sensitive receptors and off-site worker receptors would be less than significant. The Health Risk Assessment should show risks of cancer, non-cancer chronic exposure, and non-cancer acute exposure. Please provide a listing of the input data and output results, in both electronic and print formats, used to prepare the refined HRA. Please also provide the locations (UTMs or latitude and longitude) of these receptors.

As mentioned in the Executive Summary (TN 254456), the BESS would be constructed to comply with the current California Fire Code (CFC). Chapter 12, Section 1207.1.1 of the 2022 CFC requires that all BESS systems pass UL 9540A large-scale fire testing and Section 1207.31 requires that all BESS systems be listed in accordance with UL 9540 system safety certification. Additionally, Chapter 12, Section 1207.6 of the 2022 CFC requires technology-specific protection requirements that may include explosion control and thermal runaway safeguards, depending on the battery type employed for the BESS system.

To further assist CEC staff and the public in their review of the air quality and public health impacts during the battery thermal runaway/fires, staff requests supplemental information.

REV 1 DR PH-2. Please provide a copy of the UL 9540A report, if a specific battery technology/manufacturer has been chosen, including measured emissions of criteria air pollutants, toxic air contaminants, greenhouse gases (GHG), and hazardous materials. Otherwise, please provide industry average data or a literature review addressing the emissions and exhaust parameters requested in **REV 1 DR PH-3** below.

REV 1 DR PH-3. Please provide the exact locations (latitude and longitude or UTM

coordinates) and dimensions of the BESS enclosures for modeling purposes. Please provide the following input parameters for a dispersion modeling analysis of all potential criteria air pollutants, greenhouse gases, and toxic air contaminants (TACs) that could be generated during combustion: emission rates (in grams/second), exhaust temperature, pressure, and exhaust gas velocity resulting from battery damage or thermal runaway of the whole project. Please include the calculation worksheet if available.

REV 1 DR PH-4. Please provide a dispersion modeling analysis of all potential criteria air pollutants and TACs for the thermal runaway scenario using a well-validated model (AERMOD preferred).

REV 1 DR PH-5. Please compare the modeled fire-related TACs concentrations to the Office of Environmental Health Hazard Assessment (OEHHA)/ California Air Resources Board (CARB) acute Reference Exposure Levels (RELs) and demonstrate whether the acute hazard Index (HI) of TACs would be higher than the significance threshold of 1 at sensitive receptors. If an OEHHA REL is not available, a level 1 U.S. EPA Acute Exposure Guideline Level (AEGL) shall be used as the threshold of significance. Please demonstrate whether the criteria air pollutant impacts would cause or contribute to any exceedance of ambient air quality standards. If exceedances occur, provide a detailed Emergency Response Plan and outline the applicable regulatory notification requirements.

SOCIOECONOMICS

REV 1 DR SOCIO-1. The California Code of Regulations (CCR), Title 20, Article 6, Appendix B, Information Requirements for an Application, identifies the need to identify a list of the applicable local agencies (including special districts) with taxing powers and their most recent and projected revenues (Appendix B (g) (7) (A) (i)). Please provide data to identify projected revenues to clarify whether the proposed project would have an effect on revenue for each agency including direct and indirect effects.

REV 1 DR SOCIO-2. Appendix B requires the following data and analysis: an estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees; an estimate of the expenditures for locally purchased materials for the construction and operation phases of the project; an estimate of the capital cost (plant and equipment) of the project; an estimate of sales taxes generated during construction and separately during an operational year of the project; an estimate of property taxes generated during an operational year of the project; and the expected direct, indirect, and induced income and employment effects due to construction and operation of the project (Appendix B (g) (7) (B) (vii to xii)). Some data in the section remains redacted. In the event that CEC allows the applicant to exclude this data from public disclosure, the remaining redacted data must be described qualitatively. The remaining outstanding data or incomplete data associated with DR SOCIO-5

includes the following:

- Subsection 4.2, Table 4.10-23, which addresses expenditures for purchased materials (locally or otherwise) remains in the text although all data are redacted, but a discussion of the redacted data is provided. Suggest deleting the table and amending the first paragraph of Section 4.10.2 to identify the four categories of construction expenses identified in the table.
- A discrepancy occurs in Section 4.10.1, Subsection "Employment, Income Economy" for Imperial County. The text states that "As of November 2023, there were 14,048 unemployed persons in Imperial County, representing an 18.7 percent unemployment rate (refer to Figure 4.10-8) (U.S. Bureau of Labor Statistics 2024). The datapoint 11/23 does not appear on the horizontal axis for Figure 4.10-8, and data for preceding years is indicated only for January and July of each year. Please revise to address the discrepancy.
- Section 4.10.1, Subsection "Employment, Income, Economy" for Yuma County states that, "As of November 2023, there were 14,768 unemployed persons in Yuma County, representing a 14.1 percent unemployment rate compared to a national unemployment rate of 3.7 (refer to Figure 4.10-11) (U.S. Bureau of Labor Statistics 2024). Datapoint 11/23 does not appear on the horizontal axis for Figure 4.10-11, and data for preceding years is indicated only for January and July of each year. Please revise to address the discrepancy.

REV 1 DR SOCIO-3. Appendix B requires tables that identify laws, regulations, ordinances, standards; adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project; and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance with each law or standard during both construction and operation of the facility is discussed (Appendix B (i) (1) (A)). Tables 4.10-39 and 4.10-40 do not cross reference conformance with each law. Please provide data or cross-references.

TRAFFIC AND TRANSPORTATION

The response to DR TRANS-4 in TN 257953 states that up to five access points would be constructed off SR 98 to access the project site and while the exact locations would be coordinated with CalTrans and incorporated into final project engineering, expected driveways are shown on Figures 2.3-1 and 2.3-2, Project Layout Options 1 and 2 (TN 254456). CEC staff notes that SR 98 has limited access points along the segment (between Holdridge Road to the west and I-8 to the east) where the project would be located with a speed limit of 65 miles per hour. Given the existing conditions, five access points to the project site may be excessive, especially with the middle three grouped closely together. Also, staff would like to know what coordination has been done with CalTrans thus far, especially as it relates to adding the new access points.

REV 1 DR TRANS-1. Please explain if internal site circulation could be engineered

to require only two access points to SR 98.

REV 1 DR TRANS-2. Please explain project coordination undertaken with CalTrans, in particular, are CalTrans aware of the new access points and have they expressed any concerns?

WORKER SAFETY

Staff reviewed the responses to DR WS-2 and DR WS-4 (TN 257953) and have the further questions.

REV1 DR WS-3. Please provide the complete fire protection details including the size, number, and location of fire water tanks, volumes and flow rates, and location of water discharge nozzles plus BESS heat and/or flame sensors. Please also provide the anticipated date of the UL 9540A testing and submission of those results to the CEC for any battery proposed for use, and if the nearest fire authority has been contacted regarding the proposed fire protection plan. Also, as per SB-38, please provide an Emergency Response Plan as described in section g of that Act.

REV1 DR WS-4. Please provide the estimated response times from the various fire departments' stations for fire, rescue, and hazmat. Staff requires these response times to evaluate impacts on worker safety and determine if on-site first-aid or advanced medical care is required. Please provide estimates of response times from each fire station that may respond for any EMS, fire, or hazmat emergency.