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*Comment Received From: Mark A Seedall*  
*Submitted On: 11/14/2025*  
*Docket Number: 24-SPPE-01*

**AVAIO Pittsburg Backup Generating Facility (24-SPPE-01)**

I am resubmitting this document in a searchable pdf.

*Additional submitted attachment is included below.*

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November 13, 2025

Ali Jahani, Project Manager  
Siting, Transmission and Environmental Protection Division  
California Energy Commission  
715 P Street  
Sacramento, California 95814

**Subject:** AVAIO Pittsburg Backup Generating Facility (24-SPPE-01)

Dear Ali Jahani:

The following are comments from the Contra Costa Water District (CCWD) on the Initial Study/Mitigated Negative Declaration for the proposed AVAIO Pittsburg Backup Generating Facility (Project) in the City of Pittsburg. The 135-foot Contra Costa Canal right-of-way (Canal), which is owned by the U.S. Bureau of Reclamation (Reclamation) and operated and maintained by CCWD, is adjacent to the Project site and bisects the proposed Pittsburg Technology Park. On the north side of the Canal within the Reclamation right of way CCWD owns and operates the 42-inch Multipurpose Pipeline. The Contra Costa Canal and Multipurpose Pipeline provide most of the untreated and treated fresh water supply for approximately 550,000 people within Central and Eastern Contra Costa County.

CCWD has reviewed the proposed project and has the following comments:

1. CCWD understands that the Pittsburg Data Hub will be installing thirty-seven 3-megawatt back-up diesel generators in support of a 92-megawatt power demand that cannot be curtailed at any time. The site will require approximately 192,000 gallons of diesel fuel storage for a single day of backup power generation. CCWD understands that refueling the generators would take place from the south side of the generators closest to the Contra Costa Canal and that each generator will have its own fuel tank. CCWD wants to make sure that no diesel fuel escapes from the site and gets into the Canal and is concerned that the number of individual tanks that need to be filled greatly increases the possibility of a spill. CCWD recommends that all the diesel generators and fuels tanks are contained within a bermed area to better manage a spill event.
2. The Pittsburg Data Hub requires an extension of Golf Club Road that would cross the Contra Costa Canal and Multipurpose Pipeline (MPP) to access future phases of project development and to extend various utilities to those future phases. CCWD is still working with the Pittsburg Data Hub proponents to address the details of the road widening and utilities that will cross the Canal right-of-way. Since

this road and utilities will cross Reclamation's right-of-way at the Contra Costa Canal, issuance of an easement from Reclamation is necessary. National Environmental Policy Act (NEPA) compliance is required before this easement can be obtained. To obtain NEPA approval from Reclamation will require compliance with Section 106 of the National Historic Preservation Act as well as Endangered Species Act (ESA) review.

3. CCWD understands that the U.S. Army Corps of Engineers (USACE) has jurisdiction over wetlands impacted within the Backup Generating Facility project area. Coordination between Reclamation and USACE is recommended to determine the lead federal agency for this Project and to help streamline Section 106 and ESA review. CCWD does not believe there are any ESA issues within the Canal right-of-way. However, the Canal is a historic resource under Section 106 and will require State Historic Preservation Office (SHPO) review before Reclamation can approve the NEPA action.
4. Drainage associated with the Project should be directed to an appropriate storm drain system that avoids CCWD property and facilities.
5. Per CCWD's Code of Regulations, security fencing is required to be installed along the Canal right-of-way boundary line. Standard security fencing is a six-foot-high chain-link fence.
6. CCWD needs to have a complete understanding of the proposed utilities that will be installed within the Canal right-of-way including the new power lines. CCWD needs to ensure that it can perform all required short- and long-term maintenance for the Canal and Multipurpose Pipeline following completion of the new road and utilities.

For any questions or clarifications on CCWD's comments, please contact [mseedall@ccwater.com](mailto:mseedall@ccwater.com) or at 925 688-8119.

Sincerely,



Mark Seedall  
Principal Planner

Cc: Matt Holt, CCWD Senior Engineer  
Jewel Jacobson, CCWD Real Property Agent