

<b>DOCKETED</b>	
<b>Docket Number:</b>	25-OPT-02
<b>Project Title:</b>	Prairie Song Reliability Project
<b>TN #:</b>	267809
<b>Document Title:</b>	Prairie Song Reliability Project (25-OPT-02) Second Completeness Review
<b>Description:</b>	Second Completeness Review December 1, 2025
<b>Filer:</b>	Marichka Haws
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	12/1/2025 2:52:32 PM
<b>Docketed Date:</b>	12/1/2025

**Prairie Song Reliability Project  
(25-OPT-02)  
Second Completeness Review  
December 1, 2025**

Incomplete

1. Mandatory Opt-In Requirements
2. Biological Resources
3. Land Use
4. Water Resources

Complete

1. Air Quality (includes Greenhouse Gases)
2. Alternatives
3. Cultural/Tribal Cultural Resources
4. Efficiency, Energy, and Energy Resources
5. Executive Summary
6. Facility Design
7. Geological Hazards
8. Hazardous Materials Handling
9. Noise and Vibration
10. Paleontological Resources
11. Project Description
12. Public Health
13. Reliability
14. Socioeconomics
15. Soils
16. Traffic and Transportation
17. Transmission System Design
18. Transmission System Safety and Nuisance
19. Visual Resources
20. Waste Management
21. Wildfire
22. Worker Safety and Fire Protection

# DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: August **November** 2025

Technical Area: **Mandatory Opt-In Requirements**

Project: Prairie Song Reliability Project

Technical Staff: Various

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
<b>AUTHORITY AND VERIFICATION</b>				
Cal. Code Regs., tit. 20 § 1707	Every notice and application shall be dated and signed by the applicant attesting under penalty of perjury to its truth and accuracy.	Subsection 1.6.1, p. 1-8; Appendix 1D	Yes	
<b>"FACILITY" OR "DISCRETIONARY PROJECT" DEFINITION MET</b>				
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)	Explanation of how the facility meets one or more of the definitions of "facility":	Subsection 1.6.2, p. 1-9	Yes	
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)(4)	If the opt-in application is seeking certification for a discretionary project pursuant to Public Resources Code section 25545(b)(4), the application shall contain a detailed description of how the facility meets the criteria specified in section 2554(c)5(b)(4) including, as applicable, what the facility would manufacture, produce, or assemble, and how the facility's products or services would be used in the manufacture, production, or assembly of (1) energy storage systems or component manufacturing, (2) wind systems or component manufacturing, (3) solar photovoltaic energy systems or component manufacturing, or (4) specialized products, components, or systems that are integral to renewable energy or energy storage technologies.	Subsection 1.6.2, p. 1-9	Yes	

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<b>REQUIREMENTS FOR COVERED PROJECT UNDER THE LABOR CODE</b>				
Cal. Code Regs., tit. 20, § 1877(c)	Certifications required by Public Resources Code sections 25545.3.3 and 25545.3.5.	Subsection 1.6.3, pp. 1-9 to 1-10; Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3	Certification that the applicant will meet the requirements of a covered project and the commission shall make the requirements a condition of certification. Include the applicant's certification that either of the following is true:	Subsection 1.6.3, pp. 1-9 to 1-10; Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(a)	The entirety of the construction of the covered project is a public work.	N/A	N/A	N/A
Pub. Resources Code, § 25545.3.3(b)	The construction of the covered project is not in its entirety a public work for which prevailing wages must be paid, but all construction workers employed on the project will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, pursuant the Labor Code sections 1773 and 1773.9, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. For portions of the project that are not a public work, all of the following apply:	Subsection 1.6.3, pp. 1-9 to 1-10; Appendix 1C	Yes	

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Pub. Resources Code, § 25545.3.3(b)(1)	Applicant ensures that the prevailing wage requirement is included in all contracts for the performance of all construction work.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(2)	Contractors and subcontractors must pay all construction workers employed in the construction of the project at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(3)	Contractors and subcontractors performing construction work on the project shall employ apprentices at no less than the ratio required in the Labor Code section 1777.5.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(4)	Except as provided in (b)(6), all contractors and subcontractors performing construction work shall maintain and verify payroll records pursuant the Labor Code section 1776, make those records available for inspection and copying, and furnish those payroll records to the Labor Commissioner pursuant to the Labor Code section 1771.4.	Appendix 1C	Yes	

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Pub. Resources Code, § 25545.3.3(b)(5)	Except as provided in (b)(6), the pay prevailing wage provisions listed within this section may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to the Labor Code sections 1741, 1742, 1771.2, and 1742.1.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)	Paragraphs (b)(4) and (b)(5) do not apply if all contractors and subcontractors performing construction work on the project are subject to a project labor agreement. The project labor agreement shall include, but not be limited to, the following:	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(A)	Provisions requiring payment of prevailing wages to all construction workers employed in the construction of the project and for enforcement of that obligation through an arbitration procedure.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(B)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a relevant local agency.	Appendix 1C	Yes	

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Technical Staff: Various

Project Manager: Lisa Worrall

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(6)(C)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(D)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5	Certify that a skilled and trained workforce will be used to perform all construction work on the project and all of the following apply:	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(a)	Require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a skilled and trained workforce to construct the project.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(b)	Every contractor and subcontractor must use a skilled and trained workforce to construct the project.	Appendix 1C	Yes	

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Pub. Resources Code, § 25545.3.5(c)	Except as provided in (e), contractors and subcontractors that fail to use a skilled and trained workforce shall be subject to the penalties provided in the Public Contract Code section 2603.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(d)	Except as provided in (e), the applicant must retain records, including copies of monthly reports, that demonstrate compliance with the Public Contract Code section 2600 while the project or contract is being performed and for three years after completion of the project or contract. The applicant must submit these records immediately upon request of the commission. When submitted to the commission, these records shall be a public record under the California Public Records Act and shall be open to public inspection.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)	(c) and (d) do not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement. The project labor agreement shall also include, but not be limited to, all of the following:	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)(1)	Provisions requiring compliance with the skilled and trained workforce requirement and for enforcement of that obligation through an arbitration procedure.	Appendix 1C	Yes	



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Pub. Resources Code, § 25545.3.5(e)(2)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a local agency.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)(3)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)(4)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix 1C	Yes	
<b>PERMIT APPLICATIONS SUBMITTED (LOCAL, STATE, AND FEDERAL)</b>				
Cal. Code Regs., tit. 20, § 1877(d)	A discussion of whether the applicant has submitted any local, state, or federal permit applications. For any required permit that has not yet been submitted to the relevant state agency, include a plan for submitting the application and any discussions that have occurred with the state agency with authority over the project.	Subsection 1.6.4, p. 1-10; Biological Resources: Lake and Streambed Alteration Agreement Application (TN 264472, 264477, and 264476); Subsection 3.1.7, p. 3.1-64; <b>TN 264386, TN 266610, TN 266605, TN 266607, and TN 266608</b>	No	See DR-AQ-1, DR-BIO-6 through DR-BIO-12, DR-BIO-14, DR-BIO-25, DR-BIO-34 <b>See REV 1 DR BIO-2 to REV 1 DR BIO-7 and REV 1 DR BIO-13</b>
<b>IDENTIFICATION OF WHETHER SITE IS LOCATED AT A PROHIBITED AREA</b>				

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Cal. Code Regs., tit. 20, § 1877(e)	Identify whether the project is, on a prohibited site as identified in Public Resources Code section 25527 or on a site designated by the California Coastal Commission under Public Resources Code section 30413(b) or on a site designated by the San Francisco Bay Conservation and Development Commission under Government Code section 66645(b). Include documentation of the approval of the public agency having ownership or control of the land.	Subsection 1.6.5, p. 1-11	Yes	
<b>NET POSITIVE ECONOMIC BENEFIT TO THE LOCAL GOVERNMENT</b>				
Cal. Code Regs., tit. 20, § 1877(f)	Identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code section 25545.9. Staff must provide the submitted information to the local government for review and comment.	Subsection 1.6.6, pp. 1-11 to 1-12; Appendix 1E; subsection 3.10.2.3.3 pp. 3.10-17 to 3.10-20; Appendix 3.10A <b><u>TN 265874</u></b>	<del>No</del> <b><u>Yes</u></b>	<del>See DR-MAND-1</del>

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Cal. Code Regs., tit. 20 § 1879(a)(7); Pub. Resources Code § 25545.9	... economic benefits may include, but are not limited to the following: (a) Employment growth. (b) Housing development. (c) Infrastructure and environmental improvements. (d) Assistance to public schools and education. (e) Assistance to public safety agencies and departments. (f) Property taxes and sales and use tax revenues.	Subsection 1.6.6, pp. 1-11 to 1-12; Appendix 1E; subsection 3.10.2.3.3 pp. 3.10-17 to 3.10-20; Appendix 3.10A <b><u>TN 265874</u></b>	No <b><u>Yes</u></b>	See DR MAND-1
<b>LEGALLY BINDING ENFORCEABLE AGREEMENT(S) FOR COMMUNITY BENEFITS OF THE PROJECT</b>				
Cal. Code Regs., tit. 2, § 1877(g) ; Pub. Resources Code § 25545.10	Discussion of applicant's plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreement(s) with, or that benefit, a coalition of one or more community-based organizations prior to project certification, consistent with Public Resources Code section 25545.10.	Appendix 1B	Yes	
<b>ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT REQUIREMENTS</b>				
Cal. Code Regs., tit. 20, § 1877(h)	A discussion of whether the project meets the requirements of Public Resources Code sections 21183 and 21183.6.	Subsection 1.6.8, pp. 1-12 to 1-13	Yes	
Pub. Resources Code § 21183(a)	The project will result in a minimum investment of \$100,000,000 in California upon completion.	Subsection 1.6.8, p. 1-12	Yes	

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Pub. Resources Code § 21183(b)	The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, provides construction jobs and permanent jobs for Californians, helps reduce unemployment, and promotes apprenticeship training.	Subsection 1.6.8, p. 1-12, Appendix 1C	Yes	
Pub. Resources Code § 21183(c)	For a project described in Public Resources Code Section 21180(b)(1), (2), and (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles, the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation. A project is deemed to meet the requirements of this paragraph if the applicant demonstrates compliance with Public Resources Code section 21183.6.	Subsection 1.6.8, pp. 1-12 to 1-13; <b>TN 266610</b>	No <b>Yes</b>	See DR-GHG-1 to DR-GHG-7
Pub. Resources Code § 21183(d)	Demonstrates compliance with the requirements of recycling commercial solid waste and organic solid waste as required under Public Resources Code sections 42649 and 42649.8.	Subsection 1.6.8, p. 1-13	Yes	

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Pub. Resources Code § 21183(e)	Applicant entered into a binding and enforceable agreement that all mitigation measures required to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, that those measures will be monitored and enforced by the lead agency for the life of the obligation.	Subsection 1.6.8, p. 1-13; Appendix 1D	Yes	
Pub. Resources Code § 21183(f)	Applicant agrees to pay the costs of the trial court and the court of appeal in hearing and deciding any case challenging a lead agency's action on a certified project under this division...	Subsection 1.6.8, p. 1-13	Yes	
Pub. Resources Code § 21183(g)	Applicant agrees to pay the costs of preparing the record of proceedings for the project concurrent with review and consideration of the project under this division...	Subsection 1.6.8, p. 1-13	Yes	
Pub. Resources Code § 21183(h)	For a project for which environmental review has commenced, the applicant demonstrates that the record of proceedings is being prepared in accordance with Public Resources section 21186.	Subsection 1.6.8, p. 1-13	Yes	

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Pub. Resources Code § 21183.6(a)	The quantification and mitigation of the greenhouse gas emission impacts of a project described in 21180(b)(1), (2), or (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles must be as follows:	--	--	--
Pub. Resources Code § 21183.6(a)(1)	The environmental baseline for greenhouse gas emissions must be established based upon the physical environmental conditions in the vicinity of the project site at the time the application is submitted.	Subsection 1.6.8, pp. 1-12 to 1-13; Subsection 3.1.1 and 3.1.2, pp. 3.1-2 to 3.1-16	Yes	
Pub. Resources Code § 21183.6(a)(2)	Demonstrate that the mitigation of the impacts resulting from the emissions of greenhouse gases are achieved in the following priority: 1. Direct emissions reductions from the project that also reduce emissions of criteria air pollutants or toxic air contaminants through implementation of project features, project design, or other measures, including, but not limited to, energy efficiency, installation of renewable energy electricity generation, and reductions in vehicle miles traveled.	Subsection 1.6.8, pp. 1-12 to 1-13; Section 3.1; <b>TN 266610</b>	<del>No</del> <b>Yes</b>	<del>See DR GHG-1 to DR GHG-12</del>

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	<p>2. The remaining unmitigated impacts shall be mitigated by direct emissions reductions that also reduce emissions of criteria air pollutants or toxic air contaminants within the same air pollution control district or air quality management district in which the project is located.</p> <p>3. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate within the same air pollution control district or air quality management district in which the project is located. The offsets shall be undertaken in a manner consistent with the Health and Safety Code section 38500, including, but not limited to, the requirement that the offsets be real, permanent, quantifiable, verifiable, and enforceable, and shall be undertaken from sources in the community in which the project is located or in adjacent communities.</p> <p>4. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate from sources that provide a specific, quantifiable, and direct environmental and public health</p>			

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	benefit to the region in which the project is located.			



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Revision No. 01

August  
Date: **November** 2025

Carol Watson, Alex  
Single, Chris Huntley,

Technical Area: **Biological Resources**

Project: Prairie Song Reliability Project

Technical Staff: Jamison Minor

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Ann Crisp

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 3.2.1, pp. 3.2-2 through 3.2-23; subsection 3.2.2, pp. 3.2-23 through 3.2-40; Appendices 3.2A through 3.2C; Appendix 3.2F; Appendices 3-2E (TN 264475, 264474, and 264473); Lake and Streambed Alteration Agreement Application (TN 264472, 264476, and 264477); <b><u>TN 266610 and TN 266607.</u></b>	No	<del>See DR-BIO-1</del> <b><u>See REV 1 DR BIO-1</u></b>
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 3.2.1.4.1, pp. 3.2-8 through 3.2-9; subsection 3.2.1.5, pp. 3.2-9 through 3.2-11; subsection 3.2.1.6, pp. 3.2-11 through 3.2-13; Appendices 3.2A through 3.2C; Appendix 3.2F; Appendices 3-2E (TN 264475, 264474, and 264473); Lake and Streambed Alteration Agreement Application (TN 264472, 264476, and 264477); <b><u>TN 266610, TN 266605, and TN 266606.</u></b>	No <b><u>Yes</u></b>	<del>See DR-BIO-2, BIO-3, and BIO-4</del>

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Technical Area: **Biological Resources**

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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 3.2; 3.2.8, p. 3.2-61 through 3.2-66; Appendix 3-2D (TN 264477, Section 8, p. 24); <b><u>TN 266610.</u></b>	No <b><u>Yes</u></b>	See <del>DR BIO-5.</del>
[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).	<b><u>TN 264386, TN 266610, TN 266607, and TN 266608.</u></b>	No	See <del>DR BIO-6 through DR BIO-12;</del> (see also <del>DR BIO-24</del> ) <b><u>See REV 1 DR BIO-2, REV 1 DR BIO-3, REV 1 DR BIO-4, REV 1 DR BIO-5, REV 1 DR BIO-6, and REV 1 DR BIO-7. (see also REV 1 DR BIO-12)</u></b>
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.	Subsection 3.2.1, p. 3.2-2 through 3.223 3.2.2, p. 3.2-23 through 3.2-42 3.2.3, p. 3.2-41 3.2.4, p. 3.2-41 through 3.2-48; <b><u>TN 266610.</u></b>	No	See <del>DR BIO-13 and DR BIO-14</del> <b><u>See REV 1 DR BIO-7.</u></b>

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Completeness: Complete      Incomplete **X**

Revision No. **01**

August  
Date: **November** 2025

Carol Watson, Alex  
Single, Chris Huntley,

Technical Area: **Biological Resources**

Project: Prairie Song Reliability Project

Technical Staff: Jamison Minor

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE 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) (13) (A)	A regional overview and discussion of terrestrial and aquatic wildlife 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 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	Subsection 3.2.1.2 to 3.2.1.4, p. 3.2-3 through 3.2-7; Subsection 3.2.1.9 to 3.2.1.10, p. 3.217 through 3.2-22; Figures 3.2-5a and 3.2-5b; Confidential figure 3.2-5a; Appendix 3.2B; <b><u>TN 266605, TN 266610 and 266611.</u></b>	No <b><u>Yes</u></b>	See <del>DR-BIO-15</del> through <del>DR-BIO-17</del>

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	survey areas as well as the project facilities. Sensitive biological resources include:			
Appendix B (g) (13) (A) (i)	species listed under state or federal Endangered Species Acts;	Subsection 3.2.1.10; Appendix 3.2B; <b>TN 266610 and TN 266605.</b>	No <b>Yes</b>	See DR-BIO-16
Appendix B (g) (13) (A) (ii)	species receiving consideration during environmental review under CEQA Guidelines 14 CCR Section 15380;	Subsection 3.2.2; <b>TN 266610 and TN 266605.</b>	No <b>Yes</b>	See DR-BIO-16
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;	Subsections 3.2.5.1.3; Appendix 3.2B; <b>TN 266610 and TN 266605.</b>	No <b>Yes</b>	See DR-BIO-16
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;	Subsections 3.2.1.10, 3.2.1.11, and 3.2.2.2.1; Appendix 3.2B	Yes	
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 CNDDDB, 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 3.2.1.7, 3.2.1.9, 3.2.1.10, 3.2.1.14, Section 3.2.5, and Figure 3.2-8; <b>TN 266610, TN 266605, TN 266606, and TN 266607.</b>	No <b>Yes</b>	See DR-BIO-16, DR-BIO-18, DR-BIO-19, and DR-BIO-20
Appendix B (g) (13) (A) (vi)	locally significant species that are rare or uncommon in a local context such	Subsection 3.2.1.9, subsection 3.2.1.10,	No	See DR-BIO-20 and DR-BIO-21 <b>See REV 1 DR BIO-8 and REV 1 DR BIO-10</b>

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	as county or region or is so designated in local or regional plans, policies, or ordinances;	subsection 3.2.1.13, subsection 3.2.2.2.1, subsection 3.2.2.2.5, subsection 3.2.5.3, Table 5-1, Appendix 3.2B; Subsection 3.2.1.5, Table 3.2-3, subsections 3.2.1.7 and 3.2.1.14, and 3.2.2.2.1, Table 3.2-6, Subsection 3.2.2.2.5, Table 3.2-10, MM-BIO-6, Figures 3.2-7 and 3.2-9; <b>TN 266610 and TN 266607.</b>		
Appendix B (g) (13) (A) (vii)	plant species listed as rare under the California Native Plant Protection Act;	Section 3.2, pages 3.2-50 and 55	Yes	
Appendix B (g) (13) (A) (viii)	established native resident or migratory wildlife corridors or wildlife nursery sites.	Section 3.2.1.13	Yes	
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:	Species: page 3.2-7 and Appendix 3.2-B Habitat(s): pages 3.2-7 and 8, and 3.2-13 through 17); <b>TN 266610, TN 266605, and TN 266606.</b>	No	<del>See DR-22</del> <b>See REV 1 DR BIO-10</b>
Appendix B (g) (13) (B) (i)	Detailed maps at a scale of 1:6,000 or color aerial photographs taken at	Section 3.2; <b>TN 266605 and TN 266610.</b>	No	<del>See DR-23</del> <b>See REV 1 DR BIO-11</b>

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	a recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under 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.			
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.	Section 3.2.1.3.1, Appendix 3.2.F	Yes	

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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 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 3.2.F; <b><u>TN 266605, TN 266607 and TN 266610.</u></b>	No	<del>See DR-BIO-24</del> <b><u>See REV 1 DR BIO-12</u></b>
Appendix B (g) (13) (B) (iv)	Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources.	Provided separately to staff via Kiteworks due to size of files	No	<del>DR-BIO-25</del> <b><u>See REV 1 DR BIO-13</u></b>

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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:	Section 3.2.1.7, 3.2.1.9, 3.2.1.10, and 3.2.1.14; <b><u>TN 266610, TN 266605, and TN 266606.</u></b>	No	<del>See DR-BIO-2, DR-BIO-3, DR-BIO-12, and DR-BIO-16</del> <b><u>See REV 1 DR BIO-4 and REV 1 DR BIO-6</u></b>
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.)	Appendix 3.2B; Subsections 3.2.1.9 and 3.2.1.10; <b><u>TN 266610, TN 266605, and TN266607.</u></b>	No	<del>See DR-BIO-16 and DR-BIO-20</del> <b><u>See REV 1 DR BIO-8</u></b>
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	Subsection 3.2.1.6	Yes	



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	species habitats and vegetation types for wet and dry deposition. Describe habitat and species potentially affected.			
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 3.2.1.5, p. 3.2-8 through 3.2-11; Appendix 3.2A; Appendix 3.2C; <b><u>TN 266605, TN266606, TN 266607, and TN 266610.</u></b>	No	<del>See DR-BIO-26. See also DR-BIO-1, BIO-3, DR-BIO-4, and DR-BIO-23</del> <b><u>See REV 1 DR BIO-1 and REV 1 DR BIO-11</u></b>
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.	<b><u>TN 266610, TN 266605, and TN 266606.</u></b>	No <b><u>Yes</u></b>	<del>See DR-BIO-2 through DR-BIO-4</del>
Appendix B (g) (13) (D) (ii)	If the project or any related facilities could impact federal or state	Table 3.2-1, Appendix 3.2-A (entire volume), Appendix	No	<del>See DR-BIO-7 through DR-BIO-12</del>

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	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.	3.2-D (entire volume); <b><u>TN 266610, TN 266607, and TN 266608.</u></b>		<b><u>See REV 1 DR BIO-3 to REV 1 DR BIO-6</u></b>
Appendix B (g) (13) (E))	Impacts discussion of all impacts (direct, indirect, and cumulative) to biological 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);	Sections 3.2.2 and 3.2.3	Yes	
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:	Section 3.2.4; <b><u>TN 266610, TN 266605, TN 264399, and TN 264340.</u></b>	No <b><u>Yes</u></b>	<del>See DR BIO-27 through DR BIO-29</del>

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Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources.	Section 3.2.4	Yes	
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 and verification of proposed habitat mitigation measures.	Subsection 3.2.4, p. 3.2-43 through 3.2-46; <b><u>TN 266610, TN 266605, TN 264399, and TN 264400.</u></b>	No <b><u>Yes</u></b>	See DR-BIO-30
Appendix B (g) (13) (F) (iii)	Educational programs to enhance employee awareness during construction and operation to protect biological resources.	Subsection 3.2.4.1	Yes	
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.	Section 3.2.4	Yes	
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	N/A	Yes	

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	Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project.			
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	Table 3.2-11; <b><u>TN 266610</u></b>	No	See DR-BIO-21 <b><u>See REV 1 DR BIO-9</u></b>
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.	<b><u>TN 266610</u></b>	No <b><u>Yes</u></b>	See DR-BIO-31

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<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
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.	Table 3.2-13, p. 3.2-61; <b><u>TN 266610.</u></b>	No <b><u>Yes</u></b>	See <del>DR-BIO-32</del> and <del>DR-BIO-33</del>
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 2.2.6, page 3.2-61; <b><u>TN 266610</u></b>	No <b><u>Yes</u></b>	See <del>DR-BIO-10</del> and <del>DR-BIO-34</del>

# DATA COMPLETENESS WORKSHEET

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Revision No. 01 Date: ~~August~~ **November** 2025

Technical Area: Land Use

Project: Prairie Song Reliability Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Eric Knight

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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 3.6.2.1, p. 3.6-4; <b><u>TN 265874</u></b>	No <b><u>Yes</u></b>	See DR-LAND-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	Subsection 3.6.2.1, p. 3.6-4; Subsection 3.6.9, pp. 3.6-33 through 3.6-34; <b><u>TN 265874</u></b>	No <b><u>Yes</u></b>	See DR-LAND-1
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 3.6.8, pp. 3.6-33 through 3.6-34; <b><u>TN 265874</u></b>	No <b><u>Yes</u></b>	See DR-LAND-1
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	Subsection 3.6.1, pp. 3.6-2-3.6-4; Subsection 3.6.2, pp. 3.6-4 through 3.6-24; Subsection 3.6.3, pp. 3.6-24 to 3.6-25; Subsection 3.6.4, p. 3.6-25	Yes	

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Technical Staff:

Negar Vahidi, Tatiana

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Project Manager: Lisa Worrall

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Eric Knight

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	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.			
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 3.6.1.3, p. 3.6-3; Subsection 3.6.1.4, p. 3.6-3; Figure 3.6-3, p. 3.6-39; Figure 3.6-4, p. 3.6-41; <b>TN 265874</b>	No <b>Yes</b>	See DR-LAND-1
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 3.6.1.1, p. 3.6-2; Subsection 3.6.1.2, pp. 3.6-2 through 3.6-3; Subsection 3.6.1.3, p. 3.6-3; Subsection 3.6.1.4, p. 3.6-3; Figure 3.6-3, p. 3.6-39; <b>TN 265874</b>	No <b>Yes</b>	See DR-LAND-1

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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;	Section 3.6, pp. 3.6-1 through 3.6-34; <b>TN 265874</b>	No <b>Yes</b>	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 3.6.2.3, p. 3.6-23	Yes	
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.	Section 3.6, Figure 3.6-3 and Figure 3.6-4, pp. 3.6-39 through 3.6-41; <b>TN 265874</b>	No <b>Yes</b>	See DR-LAND-3
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,	Subsection 3.6.2.3, pp. 3.6-5 through 3.6-23; <b>TN 265874</b>	No <b>Yes</b>	See DR-LAND-2



# DATA COMPLETENESS WORKSHEET

Completeness: Complete \_\_\_\_ Incomplete **X**

Revision No. 01 Date: ~~August~~ **November** 2025

Technical Area: **Land Use**

Project: Prairie Song Reliability Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.			
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 those parcels so that the proposed project, excluding linears and temporary laydown or staging	Subsection 3.6.7, p. 3.6-33; <b><u>TN 265874 and TN 266803</u></b>	No	<del>See DR LAND-4</del> <b><u>See REV 1 DR LAND-1</u></b>

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Completeness: Complete \_\_\_\_ Incomplete **X**

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Technical Area: **Land Use**

Project: Prairie Song Reliability Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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 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 3.6.1.4, pp. 3.6-3 to 3.6-4; Subsection 3.6.2.3, pp. 3.6-23 to 3.6-24; Figure 3.6-5, p. 3.6-43	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 3.6.1.4, pp. 3.6-3 through 3.6-4; Subsection 3.6.2.3, pp. 3.6-23 through 3.6-24; Figure 3.6-5, p. 3.6-43	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	Subsection 3.6.1.4, p. 3.6-3; Subsection 3.6.2.3.3, p. 3.6-23	Yes	

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Technical Area: **Land Use**

Project: Prairie Song Reliability Project

Technical Staff:

Negar Vahidi, Tatiana

Inouye

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior:

Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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 3.6.1.4, p. 3.6-4; Subsection 3.6.2.3.3, p. 3.6-23; Subsection 3.6.3, p. 3.6-24	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 3.6.5, pp. 3.6-25 through 3.6-31	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	Subsection 3.6.6, Table 3.6-3, pp. 3.6-32 through 3.6-33	Yes	

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Revision No. 01 Date: ~~August~~ **November** 2025

Technical Area: Land Use Project: Prairie Song Reliability Project Technical Staff: Negar Vahidi, Tatiana Inouye  
Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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 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 3.6.6, Table 3.6-3, pp. 3.6-32 through 3.6-33; <b>TN 265874</b>	<del>No</del> <b>Yes</b>	<del>See DR-LAND-5</del>
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.	Subsection 3.6.6, Table 3.6-3, pp. 3.6-32 through 3.6-33; <b>TN 265874</b>	<del>No</del> <b>Yes</b>	<del>See DR-LAND-5</del>

# DATA ADEQUACY WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

Docket: 25-OPT-02

Revision No. 01 Date: August November 2025

Technical Staff: James Ackerman

Technical Senior: Abel-Karim Abulaban

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 3.15, p.p. 3.15-1 – 3.15-27; Appendix 3-2D, Attachments A-E; Appendix 3-2E, p.p. 1- 21, Attachments A-F; Appendix 3-15A, p.p. 17, Attachments C through K; Appendix 3-15B, p.p. 33.	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	Appendix 3-2D, Attachments A-E; Appendix 3-2E, p.p. 1- 21, Attachments A-F; Appendix 3-15A, p.p. 17, Attachments C through K; Appendix 3-15B, p.p. 33.	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 3.15.7, pp. 3.15-36 through 3.15-27; Appendix 3-15B, p. 31. <b>TN 266610</b>	Yes <b>No</b>	<b>See REV 1 DR WATER-3</b>
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.	Subsection 3.15, pp. 3.15-1 through 3.15-27.	Yes	

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Technical Area: **Water Resources**

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	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) (14) (A)	All the information required to apply for the following permits, if applicable, including:	--	--	--
Appendix B (g) (14) (A) (i)	Waste Discharge Requirements; National Pollutant Discharge Elimination System Permit; and/or a Section 401 Certification or Waiver from the appropriate Regional Water Quality Control Board (RWQCB);	Appendix 3-2E, pp. 1-21; Appendix 3-2D, Part 1 pp. A1-A13. <b>TN 266610</b>	No <b>Yes</b>	See DR WATER 4, DR WATER 7 through DR WATER 11.
Appendix B (g) (14) (A) (ii)	Construction and Industrial Waste Discharge or Industrial Pretreatment permits from wastewater treatment agencies;	Subsection 5.15.2.3.1, pp. 3.15-9 through 3.15-10; Subsection 5.15.3, p. 3.15-15, p. 3.15-16.	Yes	
Appendix B (g) (14) (A) (iii)	Nationwide Permits and/or Section 404 Permits from the U.S. Army Corps of Engineers; and	Appendix 3-2E, Attachment C Figures 1, 2, 3 and 4, Attachment D, pp. 1 through 18	Yes	
Appendix B (g) (14) (A) (iv)	Underground Injection Control Permit(s) from the U.S. Environmental Protection Agency, California Division of Oil and Gas, and RWQCB.	N/A	N/A	N/A
Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The	Subsection 3.15.1, pp. 3.15-2 through 3.15-7; Figures 3.15-1	Yes	

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	information shall include a narrative discussion and on maps at a scale of 1:24,000 (or appropriate scale approved by staff), describing the chemical and physical characteristics of the following nearby water bodies that may be affected by the proposed project:	through 3.15-7, pp. 3.15-29 through 3.15-41; Appendix 3-15A, Attachment J, p.p. 1-7, and Exhibits.		
Appendix B (g) (14) (B) (i)	Ground water bodies and related geologic structures;	Subsection 3.15.1.3.1, pp. 3.15-1 through 3.15-4; Appendix 3-15A, Subsection 3.1.2.2, p. 7; Appendix 3-4A, p. 7; Appendix 3-15B, Section 4.2, pp. 11 through 13, Section 4.2.2 and 4.2.3, pp. 15 through 16, Table 5 and 7, Figure 4	Yes	
Appendix B (g) (14) (B) (ii)	Surface water bodies;	Subsection 3.15.1.4.1, p. 3.15-6, Figure 3.15-7; Appendix 3-2D, Application Form, pp. A1 through A13, Figure 4 – Figure 4/Swale-6, Attachment D, Section 2.4, p. 6, Figure 3 and 4; Appendix 3-2E, Application Form, p. 9 of 21, Attachment C, Figure 4 – Figure 4/Swale-6, Attachment D, Appendix B, pp. 1 through 17; Appendix 3.15A, Attachment J, Exhibit 2; Attachment K, Exhibit 2;	No <b>Yes</b>	See <del>DR WATER-1</del>

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		Appendix 3.15B, Section 4.1, p. 11, Figure 3; <b>TN 266610</b>		
Appendix B (g) (14) (B) (iii)	Water inundation zones, such as the 100-year flood plain and tsunami run-up zones;	Subsection 3.15.1.5, p. 5.15-7, Subsection 3.15.2.3.3, pp. 3.15-13 through 3.15-14, Section 3.15.2.3.4, p. 5.15-14, Subsection 3.15.3, p. 3.15-16, Figure 3.15-7; Appendix 3.15A, Attachment J, Exhibits 7 through 12, Appendix C; <b>TN 266610</b>	No <b>Yes</b>	See DR WATER-1
Appendix B (g) (14) (B) (iv)	Flood control facilities (existing and proposed); and	Appendix 3-15A, Attachment H, Attachment J, Appendix C, Attachment K, Appendix F.	Yes	
Appendix B (g) (14) (B) (v)	Groundwater wells within 1/2 mile if the project will include pumping.	Table 3.15-1, p. 3.15-5; Appendix 3-15B, Table 6, p. 14; Appendix 3-15B, Figure 5, p. 45.	Yes	
Appendix B (g) (14) (C)	A description of the water to be used and discharged by the project. This information shall include:	--	--	--
Appendix B (g) (14) (C) (i)	Source(s) of the primary and back-up water supplies and the rationale for their selection;	Appendix 3-15B, p.p. 1-13	Yes	
Appendix B (g) (14) (C) (ii)	The expected physical and chemical characteristics of the source and discharge water(s) including identification of both organic and inorganic constituents before and after any project-related treatment. For source waters with seasonal	Subsection 3.15.1.4.2, p. 3.15-6, Table 3.15-2; <b>TN 266610</b>	No	See DR WATER-2 <b>See REV 1 DR WATER-1 and REV 1 DR WATER- 2</b>



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Technical Area: **Water Resources** Project: Prairie Song Reliability Project

Project Manager: Lisa Worrall Docket: 25-OPT-02

Revision No. 01 Date: August November 2025

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	variation, provide seasonal ranges of the expected physical and chemical characteristics. Provide copies of background material used to create this description (that is, laboratory analysis);			
Appendix B (g) (14) (C) (iii)	Average and maximum daily and annual water demand and waste water discharge for both the construction and operation phases of the project;	Subsection 3.15.2.3.2, p. 3.15-12; Appendix 3-15B, Section 2, pp. 5 through 7. <b>TN 266610</b>	No <b>Yes</b>	See DR WATER-3
Appendix B (g) (14) (C) (iv)	A detailed description of all facilities to be used in water conveyance (from primary source to the power plant site), water treatment, and wastewater discharge. Include a water mass balance diagram;	Subsection 2.3.1.10, p. 28; Subsection 3.6.2.3.2, p. 3.6-22; Subsection 3.10.1.7.3, p. 3.10-11; Subsection 3.11.2.3.4, p. 3.11-8; Subsection 3.16.2.3.3, p. 3.16-17; <b>TN 266610</b>	No <b>Yes</b>	See DR WATER-3
Appendix B (g) (14) (C) (v)	For all water supplies intended for industrial uses to be provided from public or private water purveyors, a letter of intent or will-serve letter indicating that the purveyor is willing to serve the project, has adequate supplies available for the life of the project, and any conditions or restrictions under which water will be provided. If a will-serve letter or letter of intent cannot be provided, identify the most likely water purveyor and discuss the necessary	Appendix 3-15B, Appendices A and C.	Yes	

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Project: Prairie Song Reliability Project

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	assurances from the water purveyor to serve the project;			
Appendix B (g) (14) (C) (vi)	For all water supplied which necessitates transfers and/or exchanges at any point, identify all parties and contracts/agreements involved, the primary source for the transfer and/or exchange water (that is, surface water, groundwater), and provide the status of all appropriate agencies' approvals for the proposed use, environmental impact analysis on the specific transfers or exchanges required to obtain the proposed supplies, a copy of any agency regulations that govern the use of the water, and an explanation of how the project complies with the agency regulation(s);	Subsection 3.15.2.3.2. p. 3.15-12; Subsection 3.15.2.3.4. p. 3.15-14; Subsection 3.15.5, pp. 3.15-16 through 3.15- 25; Appendix 3-15B, Section 4.3, pp. 16 through 17; Section 5, pp. 18 through 22; Section 6, p.p. 23 through27; Section 7, p. 29; Appendices A to E.	Yes	
Appendix B (g) (14) (C) (vii)	Provide water mass balance and heat balance diagrams for both average and maximum flows that include all process or ancillary water supplies and wastewater streams. Highlight any water conservation measures on the diagram and the amount that they reduce water demand; and	N/A	N/A	N/A
Appendix B (g) (14) (C) (viii)	For all projects which have a discharge, provide a copy of the will-serve letter, permit or contract with	N/A	N/A	N/A

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	<p>the public or private entity that will be accepting the wastewater and contact storm water from the project. The letter, permit or contract, if possible, shall identify the discharge volumes and the chemical or physical characteristics under which the wastewater and contact storm water will be accepted.</p> <p>In the event that a will-serve letter, permit, or contract cannot be provided, identify the most likely wastewater/storm water entity and discuss why the applicant was unable to secure the necessary assurances to serve the project's wastewater/storm water needs. Also, discuss the term of the wastewater service to the project, whether the wastewater entity has adequate permit capacity for the volume of wastewater from the project and has adequate permit levels for the chemical/physical characteristics of the project's wastewater and storm water for the life of the project, and any issues or conditions/restrictions the wastewater entity may impose on the project.</p>			

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Appendix B (g) (14) (D)	Identify all project elements associated with stormwater drainage, including a description of the following:	--	--	--
Appendix B (g) (14) (D) (i)	Monthly and seasonal precipitation and stormwater runoff and drainage patterns for the proposed site and surrounding area that may be affected by the project's construction and operation;	Subsection 3.15.1.1, pp. 3.15-2 through 3.15-3; Subsection 3.15.1.2, p. 3.15-3; Subsection 3.15.3, pp. 3.15-15 through 3.15-16; Appendix 3.15A, Section 3, p.p. 7 through 10; Attachment J, Appendix A, 4 pp.; Attachment K, Site Condition Section, pp. 5 through 6. <b>TN 266610</b>	No <b>Yes</b>	See DR WATER 1
Appendix B (g) (14) (D) (ii)	Drainage facilities and the design criteria used for the plant site and ancillary facilities, including but not limited to capacity of designed system, design storm, and estimated runoff;	Subsection 3.15.2.3.1, pp. 3.15-9 through 3.15-11; Appendix 3.15A, Section 4, p.p. 11 – 12, Section 5, pp. 15 through 16, Attachment H, pp. 1 through 8, Attachment K, Stormwater Management Practice Section, pp. 10 through 11; Appendix 2A (Drawing No. PSR-CS-004 S001 - S014, PSR-CS-005 S001 & S002, PSR-CS-006 S001, PSR-CS-007 S001 – S006, PSR-CS-008 S001 & S002, PSR-CS-009, PSR-CS-010); <b>TN 266610</b>	No <b>Yes</b>	See DR WATER 5 and DR WATER 6

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Technical Area: **Water Resources**

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (D) (iii)	All assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post-construction; and	Appendix 3.15A, Sections 2- 5, pp. 4 through 16, Attachments D, E, and K.	Yes	
Appendix B (g) (14) (D) (iv)	A copy of applicable regional and local requirements regulating the drainage systems, and a discussion of how the project's drainage design complies with these requirements.	Section 3.15, pp. 3.15-16 through 3.15-25; Appendix 3.15A, Attachments K.	Yes	
Appendix B (g) (14) (E)	An impacts analysis of the proposed project on water resources and a discussion of conformance with water-related LORS and policy. This discussion shall include:	--	--	--
Appendix B (g) (14) (E) (i)	The effects of project demand on the water supply and other users of this source, including, but not limited to, water availability for other uses during construction or after the power plant begins operation, consistency of the water use with applicable RWQCB basin plans or other applicable resource management plans, and any changes in the physical or chemical conditions of existing water supplies as a result of water use by the power plant;	Appendix 3-15B, WSA, pp. 1 through 31.	Yes	
Appendix B (g) (14) (E) (ii)	If the project will pump groundwater, an estimation of aquifer drawdown based on a	Appendix 3-15B, WSA, Section 2.2, pp. 5 through 7; Section	Yes	

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	computer modeling study shall be conducted by a professional geologist and include the estimated drawdown on neighboring wells within 0.5 mile of the proposed well(s), any effects on the migration of groundwater contaminants, and the likelihood of any changes in existing physical or chemical conditions of groundwater resources shall be provided;	4.2, Table 6, pp. 11 through 16; Section 7, p. 29.		
Appendix B (g) (14) (iii)	The effects of construction activities and plant operation on water quality and to what extent these effects could be mitigated by best management practices;	Appendix 2A (Drawing No. PSR-CS-004 S001 - S014, PSR-CS-005 S001 & S002, PSR-CS-006 S001, PSR-CS-007 S001 – S006, PSR-CS-008 S001 & S002, PSR-CS-009, PSR-CS-010); <b><u>TN 266610</u></b>	No <b><u>Yes</u></b>	<del>See DRs WATER 4 &amp; WATER 5</del>
Appendix B (g) (14) (iv)	If not using a zero liquid discharge project design for cooling and process waters, include the effects of the proposed wastewater disposal method on receiving waters, the feasibility of using pre-treatment techniques to reduce impacts, and beneficial uses of the receiving waters. Include an explanation why the zero liquid discharge process is "environmentally undesirable," or "economically unsound;"	N/A	N/A	N/A

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Appendix B (g) (14) (v)	If using fresh water, include a discussion of the cumulative impacts, alternative water supply sources and alternative cooling technologies considered as part of the project design. Include an explanation of why alternative water supplies and alternative cooling are "environmentally undesirable," or "economically unsound;"	Appendix 3-15B, pp. 1 through 13, Table 1 through 11, Figures 1- 6, Appendix A through E.	Yes	
Appendix B (g) (14) (vi)	The effects of the project on the 100-year flood plain, flooding potential of adjacent lands or water bodies, or other water inundation zones; and	Subsection 3.15.1.5, p. 3.15-7.	Yes	
Appendix B (g) (14) (vii)	All assumptions, evidence, references, and calculations used in the analysis to assess these effects.	Appendix 3-15A, Attachment J, p.p. 1-7, and Exhibits.	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 3.15.5, Table 3.15-3, p.p. 3.15-16 - 3.15-25; Table 5-1, pp. 5-1 through 5-15.	Yes	

# DATA ADEQUACY WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

Docket: 25-OPT-02

Revision No. 01 Date: August **November** 2025

Technical Staff: James Ackerman

Technical Senior: Abel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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 3.15.6, Table 3.15-4, p. 3.15-26; Table 6-1, pp. 6-1 through 6-5.	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.	Table 3.15-4, p. 3.15-26; Table 6-1, p.p. 6-1 through 6-5.	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 3.15.6 & Table 3.15-4, p. 3.15-26.	Yes	



## **REV 1 DATA REQUESTS**

### **BIOLOGICAL RESOURCES**

The Data Request Response to DR BIO-1 included several representative photos of upland habitat (photos 1 through 10), aquatic features (photos 11 through 24), and swales and erosional features (photos 26 through 30) (Attachment 15: Appendix 3.2I–Photo Exhibit (TN 266607)). However, it is unclear if the photos provided include representative portions of the site that would be developed, as requested in DR BIO-1.

**REV 1 DR BIO-1.** Please provide photos of areas that would be developed including photos of upland areas on each side of Soledad Canyon Road where the BESS array would be built and of upland areas where the substation would be built.

The Data Request Response to DR BIO-6 included the applicant's proposed mitigation measure MM-BIO-4, which provides avoidance and minimization measures for Crotch's bumble bee, and the applicant's statement that the project is not expected to involve take of Crotch's bumble bee (TN 266610, response DR BIO-6). However, as Crotch's bumble bee have a low detection probability and move nest sites each year, CDFW recommends that project proponents perform a full round of surveys each year that project activities would occur or assume presence of the species (CDFW 2023). CDFW also recommends that a biological monitor be present during vegetation removal and ground-disturbing activities (CDFW 2023). As there is habitat present on the project site and the project is within the range of Crotch's bumble bee, there is potential for Crotch's bumble bee to move on to the project site after the surveys that have been conducted but before ground disturbance, as well as potential for Crotch's bumble bee to move on to the project site during construction. As such, CEC staff recommends that the applicant apply for incidental take authorization for Crotch's bumble bee under the CEC's in-lieu permitting authority or full avoidance of the species would be required. Securing incidental take authorization at this stage would help prevent potential project delays associated with implementing full avoidance measures or pursuing a post-certification project change to obtain take authorization should Crotch's bumble bee be detected on the project site in the future.

**REV 1 DR BIO-2.** Please confirm that the project will not seek in-lieu take authorization for Crotch's bumble bee. Alternatively, state that the project will seek in-lieu take authorization for Crotch's bumble bee. If seeking take authorization, please provide all the information required in California Code of Regulations, title 14, section 783.2(a)(1)(a)(10).

The Data Request Response to DR BIO-7 provided information regarding culverts or other potential jurisdictional features that would be in the work area, including those affected by project-related traffic. However, it is not clear from the response if the proposed project-related increased use of roads during construction and operation

would result in siltation, require culvert repair, or result in other impacts to streams, including any downstream impacts.

**REV 1 DR BIO-3.** Please describe any proposed upgrades or maintenance activities along existing and new access roads, including those southeast of Carson Mesa Road, during construction and operation. The description should include potential upgrades and maintenance activities of interest and specific locations: culvert repair, culvert installation, prism expansion, or gravel augmentation.

The Data Request Response to DR BIO-11 provided standalone information that would be included in a Lake and Streambed Alteration Agreement (LSAA) notification in Attachment 16: Appendix 3.2K– Completed 1602 Lake and Streambed Alteration Agreement Application Package (TN 266607). However, it is unclear from the project description what activities will take place in areas subject to Fish and Game Code, sections 1602 through 1615. For the purposes of seeking lake and streambed alteration authorization, the project description should be limited to the portions of the overall project that intersect with streams or associated riparian areas.

**REV 1 DR BIO-4.** Please resubmit Attachment 16: Appendix 3.2K– Completed 1602 Lake and Streambed Alteration Agreement Application Package with a project description that only includes portions of the overall project that intersect with streams or associated riparian areas.

**REV 1 DR BIO-5.** Please submit a map clearly labelling each area where the project footprint would intersect with streams or associated riparian areas, the type of work that will occur in each of these areas, and the amount of permanent and temporary impacts in each area.

**REV 1 DR BIO-6.** Describe the potential for animals to become entrapped in the underground stormwater retention system, or in other portions of the drainage system, and if minimization measures are necessary or feasible to prevent entrapment of small animals.

The Data Request Response to DR BIO-12 provided updated figures and GIS shapefiles that included project access roads and any other project-related disturbances. However, there are discrepancies between the total permanent and temporary impact areas listed in the Land Cover table in Table 3.2-9 in the Data Request Response to DR BIO-13 (TN 266610), which details temporary and impacts of impact by project component and habitat type, and those listed in Table 3.2-6 of the initial application (TN 264413).

**REV 1 DR BIO-7.** Please explain why the impact areas reported in Table 3.2-9 differ from those reported in Table 3.2-6, despite the fact the project design has not changed.

The Data Request Response to DR BIO-20 did not include the requested updates to the “Special-Status Wildlife” table in Appendix 3.2B of the Application. Specifically, the table

was not revised to include potential for species to occur based on the definition of "Sensitive Local Native Resource" (Los Angeles County Sensitive Bird Species Working Group, 2009), or identify which may have the potential to occur.

**REV 1 DR BIO-8.** Please update the "Special-Status Wildlife" table in Appendix 3.2B of the Application to include vesper sparrow (*Pooecetes gramineus*), western meadowlark (*Sturnella neglecta*), and Scott's oriole (breeding) (*Icterus parisorum*). Please resubmit the "Special-Status Wildlife" table in Appendix 3.2B to reflect the potential to occur for these species within 10 miles of the project area. Please submit a clean and redline and strikethrough version of the table.

The Data Request Response to DR BIO-21 partially provided requested materials for CEC staff to determine whether the project would conform with the Los Angeles County Significant Ecological Area (SEA) Ordinance, including a (1) Biological Constraints Map, (2) a Conceptual Project Design, (3) a Biota Report, and (4), a Protected Tree Report. However, the applicant's submitted materials in response to DR BIO-21 are incomplete per the requirements set forth in the SEA Ordinance as they did not include subparts as listed below. If currently unavailable, please describe constraints and projected timeline to completion.

**REV 1 DR BIO-9.**

1. Please provide an updated Biological Constraints Map (BCM), originally included as Attachment B to the Biota Report (TN266606). Please incorporate the following items from the SEA Ordinance Guidelines, defined under Section 22.14.190 (D) and Chapter 6 (pp. 64-65) of the SEA Implementation Guide, into the BCM:
  - a) Parcel boundaries
  - b) Sensitive species and protected tree observations (see Comment 3o, below under Biota Report and Comment 4a. below under Protected Tree Report)
  - c) Include existing protected open space that has been recorded on or adjacent to any part of the subject parcel.
2. Please provide a Conceptual Project Design (CPD), required under section 22.102.050 (A) (3) of the SEA Ordinance and consistent with Chapter 5, no. 3 (p. 54) of the SEA Implementation Guide. The CPD can be shown directly on the BCM or separately as a Conceptual Site Plan.
3. The Biota Report included in Appendix 3.2G (TN266606,) is considered incomplete. Please provide a crosswalk of the following information as required under section 22.102.080 (B) (1) (b) of the SEA Ordinance and consistent with the requirements defined in Chapter 6 (pp. 67-68) of the SEA Implementation Guide:

- a. Information typically required on the cover page of Biota Reports is missing, including, APNs, and a clear indication that the contact listed on the report is the head/supervising biologist leading the effort.
  - b. a parcel and acreage table
  - c. topographic map (with parcel outlines, SEA boundaries, open space areas)
  - d. topographic lines superimposed on site plans with vegetation mapped
  - e. grading plans with vegetation superimposed (if currently available)
  - f. description of disturbance schedule
  - g. a table of impacts to all vegetation types (including non-sensitive vegetation)
  - h. a table of acreages, additions and deductions of SEA lands
  - i. a map of proposed vegetation impacts with grading and fuel-modification superimposed on the vegetation map
  - j. a map showing locations of sensitive plant species observations, along with protected tree species, indicating removals and/or disturbances proposed
  - k. a map showing wildlife corridors and habitat linkages, as well as any site-specific features (ridgelines, drainages, culverts, fencing, etc.) that may facilitate or constrain movement, near the project that could be impacted
  - l. discussion of impacts on sensitive vegetation types, including references to Global and State Ranks that serve as a basis to demonstrate if the vegetation type is rare at the state level or throughout its global distribution
  - m. inclusion of birds on the LA County Sensitive Bird Species in potential-to-occur tables and discussion where relevant
  - n. requisite mapping and a detailed discussion of rare plants included in the plant compendium (Note: Raven's blazing-star (*Mentzelia ravenii* CRPR 1B.3) smooth goldfields (*Lasthenia glaberrima*, CRPR 1B), and Douglas' fiddleneck (*Amsinckia douglasiana*, CRPR 4.2) are listed in the plant compendium but are not discussed in the report or mapped in the maps
  - o. a discussion of wildlife corridors and habitat linkages, as well as any site-specific features (ridgelines, drainages, culverts, fencing, etc.) that may facilitate or constrain movement, near the project that could be impacted
  - p. a discussion of impact acreage remaining as natural open space and percentage of the original,
  - q. a discussion of existing designated open space on and adjacent to the parcel in question
4. The Protected Tree Report, provided as Appendix A of the Biota Report (TN266606, Appendix 3.2G), is missing components as required under section 22.102.070 (C) (2) of the SEA Ordinance. Please update the Protected Tree

Report to include the following information, or if not possible due to level of design, for instance, or other, similar preventative situation, please explain why:

- a. Santa Clara SEA Trees: Please map and discuss the occurrence of blue elderberry (*Sambucus nigra* ssp. *caerulea*), which is included in the species list for the rare plant survey report but is not mapped or discussed in report.
- b. Provide a map of tree protected zones (TPZs) with potential encroachments, currently up to 13 trees. Clearly identify trees that are proposed to be preserved or may require removal on the maps. Identify the extent of encroachment for each alignment.
- c. Specify details on whether the "impact percent" in the Tree Information Matrix refers to an impact on the encroachment area or the tree canopies (i.e., pruning). Please provide clarification in the revised Section 3.2 (Impact Analysis) regarding impacts to the encroachment area, if not already provided.

The Data Request Response to DR BIO-22, provided a list of species observed within 1,000 feet of the linear facility corridors, however, it did not provide a description of all species expected to occur, as well as those observed, within 1,000 feet of the linear facility corridors.

**REV 1 DR BIO-10.** Please revise the list and associated descriptions to include the following bird species which meet the definition of "Sensitive Local Native Resource" (Los Angeles County Sensitive Bird Species Working Group, 2009): vesper sparrow (*Pooecetes gramineus*), western meadowlark (*Sturnella neglecta*), Scott's oriole (breeding) (*Icterus parisorum*). These species should be incorporated into the discussion of special-status species (see also REV 1 DR BIO-8. Please submit a clean and redline and strikethrough version of revised Section 3.2.

The Data Request Response to DR BIO-23, did not provide the requested detailed maps indicating where biological surveys were conducted for Crotch's bumble bee or rare plants, including transects, surveys routes, and/or polygons of surveyed area.

**REV 1 DR BIO-11.** Provide maps showing the areas surveyed for Crotch's bumble bee and rare plant surveys. See also **REV 1 DR BIO-9.**

The Data Request Response to DR BIO-24 included GIS shapefiles for CEC staff's review provided via Kiteworks. These files depict at least three areas where the aquatic delineation does not extend 250 feet from the edge of project impacts, as required by California Code of Regulations, title 20, Appendix B (g) (13) (B) (iii), for example at the following locations: 34.4892232, -118.1324951; 34.481079, -118.138441; 34.4848120, -118.1436440; and 34.4901630, -118.1330659.

**REV 1 DR BIO-12.** Please provide an updated aquatic resources delineation and corresponding map for all areas where a water feature extends from the project

impact limits out to 250 feet from the project impacts. This includes, but is not limited to, the following coordinates: 34.4892232, -118.1324951; 34.481079, -118.138441; and 34.4848120, -118.1436440; and 34.4901630, -118.1330659. If field-based data cannot be provided for specific areas via ground-truthing, please include a justification, such as lack of property access, for the omission. A desktop-based delineation is acceptable for this request; however, clearly indicate where field verification (ground-truthing) has not been conducted.

The Data Request Response to DR BIO-25, includes GIS shapefiles, however, some files appear to be missing.

**REV 1 DR BIO-13.** Please provide GIS shapefiles reflecting any updates to the waters maps (include updated map), as well as shapefiles for the Crotch's bumble bee and rare plant survey maps. Additionally, provide shapefiles for any other maps described in the data requests (see also **REV 1 DR BIO-5**, **REV 1 DR BIO-7**, and **REV 1 DR BIO-9**).

## REFERENCES CITED

CDFW 2023 - California Department of Fish and Wildlife (CDFW). 2023. "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species". June 6, 2023. Accessed online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150>

Los Angeles County Sensitive Bird Species Working Group 2009. Los Angeles County's Sensitive Bird Species. Western Tanager 75(3):1-11. Accessed online at: <https://planning.lacounty.gov/wp-content/uploads/2022/11/LA-Countys-Sensitive-Bird-Species.pdf>

## LAND USE

California Code of Regulations, title 20, Appendix B (g) (3) (C) requires the application to discuss the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, the application must describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linear infrastructure and temporary laydown or staging area, will be located on a single legal parcel.

On August 1, 2025, staff submitted DR LAND-4 (TN 265211) to the docket, which requested documentation of site control for each of the parcels within the project site. On September 4, 2025, the applicant provided a response to DR LAND-4 (TN 265874) that included a table of the terms and conditions of each purchase or lease agreement, and copies of the agreements. On October 23, 2025, the applicant provided an updated response to DR LAND-4 (TN 266803) that updates and supersedes the response provided on September 4, 2025. Staff reviewed the documentation and identified a few parcels for which further clarification is needed regarding the status of lease or purchase agreements.

**REV 1 DR LAND-1.** Staff has the following questions regarding the information provided in the applicant's response to DR LAND-4 (TN 266803):

1. The applicant's table of lease agreement information (TN 266803, pages 1-2) indicates that the project's north gen-tie would require an easement agreement for APN 3056-017-904. Note that Project application Figure 3.6-2 (APN Map) (TN 264413) illustrates the north gen-tie line crossing through APN 3056-017-905 and APN 3056-017-026, and does not identify any project components being sited within APN 3056-017-904. To resolve this discrepancy, staff requests the following information:
  - a. Clarify the project components that would be located in APN 3056-017-904.
  - b. Confirm which parcels would require easement agreements for the project's north gen-tie line. Provide details on the duration of each easement agreement and the width of each easement.
2. Project application Figure 3.6-2 (APN Map) (TN 264413) indicates that the Point of Change of Ownership (POCO) transmission structure would be located on APN 3056-015-008. However, project application Section 2.3.2.1 states that the POCO structure would be sited on APN 3056-015-023. Please clarify on which parcel(s) the POCO structure would be located.

## **WATER RESOURCES**

### **On-Site Groundwater Well**

Based on consultation with the State Water Resources Control Board, Division of Drinking Water (SWCRB-DDW), and the Los Angeles Regional Water Quality Control Board (LARWQCB), the on-site groundwater production well would need to be evaluated as a public water system pursuant to Section 116275 of the California Safe Drinking Water Act, since it would be used as a potable water source for project employees during operation. If the SWCRB-DDW determines that the on-site groundwater well is not a public water system, local county ordinances regarding requirements for a potable water source may still apply.

In response to DR WATER-2 (TN266609 & TN266610), analytical results of on-site groundwater well sampling were included as Attachment 30, Appendix 3-15C of the Data Request Response 2 submittal. Analysis included general water chemistry, Title 22 metals, microbiological, and radio chemistry constituents. The LARWQCB has commented that additional analysis of on-site groundwater is necessary due to current drinking water characterization requirements, such as beta particle and photon radioactivity pursuant to 22 CCR 64443 and radium 226 and radium 228 pursuant to 22 CCR 64442.

**REV 1 DR WATER-1.** Please coordinate with the local SWCRB-DDW to assess whether the on-site groundwater production well qualifies as a public water system.

**REV 1 DR WATER-2.** Please conduct additional sampling of the on-site groundwater well and analyze for the following analytes:

1. Beta particle and photon radioactivity
2. Radium 226 and radium 228
3. Strontium
4. Tritium
5. Pesticides diazinon and propachlor
6. Per- and polyfluoroalkyl substances (PFAS)
  - a. Perfluorobutanesulfonic acid (PFBS)
  - b. Perfluorohexanesulfonic acid (PFHxS)
  - c. Perfluorooctanoic acid (PFOA)
  - d. Perfluorooctanesulfonic acid (PFOS)
  - e. Perfluorohexanoic Acid (PFHxA)

**Reference of the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties**

In response to DR WATER-8 (TN266610), a narrative describing the Los Angeles and Lahontan basin plans was added to Subsections: 3.15.1.2, 3.15.1.3.1, and 3.15.5.2, as documented in Attachment 24 (TN 266607, Section 3-15 Water Resource redline version) of the Data Request Response 2 submittal. However, LARWQCB staff noticed some discrepancies for the reference to the Los Angeles and Ventura Counties Watershed Basin Plan in Section 3.15.7.

**REV 1 DR WATER-3.** Please revise the following details of the Los Angeles Regional Water Quality Control Board's Basin Plan citation in the References Section 3.15.7:

1. The last revision to the basin plan occurred in March 2022 and should be reflected in the reference date.
2. Please make sure your analysis is based on the March 2022 basin plan. Update your analysis accordingly and provide a redline version.