

DOCKETED

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Project Title:	NorthTown Backup Generating Facility (NTBGF)
TN #:	271397
Document Title:	Data Requests Set 3 for NorthTown Backup Generating Facility
Description:	CULTURAL AND TRIBAL CULTURAL RESOURCES
Filer:	Ali Jahani
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**CALIFORNIA
ENERGY COMMISSION**



July 13, 2026

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

RE: Data Requests Set 3 for NorthTown Backup Generating Facility (25-SPPE-02)

Dear Mr. Galati:

Pursuant to Title 14, California Code of Regulations, section 15084(b) and Title 20, California Code of Regulations, section 1941, the California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 3, which is necessary for the staff analysis of the NorthTown Backup Generating Facility (NTBGF), under the California Environmental Quality Act (CEQA).

These follow up requests seek further information in the area of Cultural Resources based on the contents of the application submitted thus far. CEC staff may submit subsequent data requests in this and other resource areas based on further information received or as necessary for a complete analysis of the proposed project.

To assist CEC staff in timely completing its environmental review and to meet the requirements of CEQA pursuant to Title 14, California Code of Regulations, sections 15108 and 15109; staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please send written notice to me within 10 days of receipt of this letter.

If you have any questions, please email me at Elizabeth.Huber@energy.ca.gov.

Elizabeth Huber
Project Manager

Enclosure: Data Requests Set 3

CULTURAL AND TRIBAL CULTURAL RESOURCES

Author: Patrick Riordan

BACKGROUND: Results of Literature Search

Several data requests were made in Data Request Set 1 (TN 265198) related to the results of the cultural resource literature search discussed in the applicant's Confidential Cultural Resources Technical Report (CRTR, Chronical Heritage 2025a). **DR CUL/TRI-1** requested the applicant provide copies of site records for resource **P-43-003283**. **DR CUL/TRI-2** requested that the applicant provide a copy of a map of past cultural resources surveys of the literature search area. **DR CUL/TRI-3** requested that the applicant provide a map of all previously known cultural and tribal cultural resources compiled through their research. Finally, **DR CUL/TRI-4** requested copies of all technical reports whose survey coverage is wholly or partly within 0.25 miles of the area surveyed for the proposed project, or which report on any archaeological excavations or architectural surveys within the literature search area.

The applicant indicated in their Responses to Data Requests Set 1 (TN 267634) that the information related to **DR CUL/TRI-1** and **DR CUL/TRI-4** would be provided to the CEC once the applicant received from the Northwest Information Center (NWIC), and information related to **DR CUL/TRI-2** and **DR CUL/TRI-3** would be included in a Revised CRTR, docketed under a repeated request for confidentiality. On March 13, 2026, CEC staff received a Revised CRTR (Chronical Heritage 2025b) from the applicant and on April 22, 2026, received the attachments to the revised CRTR. The CEC staff has reviewed the Revised CRTR and attachments and has follow-up requests pertaining to the results of the literature search.

The CEC's information requirements related to the results of literature searches conducted to identify cultural and tribal cultural resources are detailed in California Code of Regulations, Title 20, Division 2, Chapter 5, Appendix B (g)(2)(B). SPPE applications shall include copies of California Department of Parks and Recreation (DPR) 523 series forms for all cultural and tribal cultural resources identified in the literature search. The letter report from the NWIC included in Attachment A of the revised CRTR provides the results of the applicant's requested records search "with the requested resources and reports removed." (Richards 2025).

The Revised CRTR states that the results of the records search indicated that no previously identified cultural resources had been identified within the project area (Chronical Heritage 2025b, page i). However, the Records Search Results Map provided in Attachment A depicts resource **P-43-000318** within the project area. Site records for this resource were not included in the revised cultural resources technical report and the resource was not identified, described, or considered in the Revised CRTR.

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The Records Search Results Map prepared in response to **DR CUL/TRI-3** is in Attachment A of the Revised CRTR but does not include Resource **P-43-000317**.

Resource **P-43-000649** is depicted on the Records Search Results Map. Based on the records for this archaeological site, a portion of it occupies the eastern bank of the Guadalupe River adjacent to the project site and might extend into the project area (Kaijankoski 2012, pages 1–2; Voss et al. 1993, p. 1). Despite the nearness of P-43-000649 to the project site, the resource is not discussed in the Revised CRTR.

Attachment A of the Revised CRTR contains copies of all previous technical reports identified by the NWIC as wholly or partly within the project area. However, copies of excavation reports identified within the literature search area are not included in Attachment A of the Revised CRTR.

DATA REQUESTS

REV 3 CUL/TRI-1 Please provide a copy of the records search request to the NWIC so that it is evident to the CEC staff which resources and reports were identified and then removed when the NWIC reported its results to the applicant.

REV 3 CUL/TRI-2 Please provide the site records for resource **P-43-000318** and revise the CRTR to describe, evaluate, and consider the project's potential impacts to the resource and propose measures to avoid or minimize potential adverse effects to the resource, as applicable.

REV 3 CUL/TRI-3 Provide a revised Records Search Results Map that includes resource **P-43-000317**.

REV 3 CUL/TRI-4 Please revise the CRTR to describe, evaluate, and consider the project's potential impacts to resource **P-43-000649**. Propose measures to avoid or minimize potential adverse effects to the resource, as applicable.

REV 3 CUL/TRI-5 Provide copies of the following excavation reports on file at the NWIC identified within the literature search area:

- **S-004651 (Bard et al. 1979)**
- **S-004819 (Kobori et al. 1979)**
- **S-004835 (Kobori and Bard 1980)**
- **S-004959 (Bard et al. 1981)**
- **S-006310 (Cartier 1983)**
- **S-006387 (Busby et al. 1981)**
- **S-006409 (Busby et al. 1983)**
- **S-007552 (Bard et al. 1985)**

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- **S-008227 (Bard et al. 1986)**
- **S-038292 (Koenig 2011)**
- **S-015131 (Cartier et al. 1993)**
- **S-019387 (Cartier et al. 1996)**

REFERENCES

Chronical Heritage 2025a – PaleoWest, LLC dba Chronicle Heritage. Draft Cultural Resources Technical Report for the North Town Data Center Project, 350-370 West Trimble Road, San Jose, California. Prepared for David J. Powers & Associates, Inc., Oakland, CA. Submitted under confidential cover.

Chronical Heritage 2025b -- PaleoWest, LLC dba Chronicle Heritage. Draft Cultural Resources Technical Report for the North Town Data Center Project, 350-370 West Trimble Road, San Jose, California. Prepared for David J. Powers & Associates, Inc., Oakland, CA. December 15, 2025. TN 269297.

Kaijankoski 2012 – Phil Kaijankoski. Department of Parks and Recreation 523 Update Forms for P-41-000649 (CA-SCL-000762). Confidential record on file, Northwest Information Center, California Historical Resources Information System, Rohnert Park. Far Western Anthropological Research Group, Inc., Davis, CA, May 25, 2012.

Richards 2025 – Dana Richards, Northwest Information Center Letter Report Re: 25-PC-05450 North Town Data Center. March 20, 2025. NWIC File No.: 24-1315.

Voss et al. 1993 – Barb Voss, Leigh Martin, and Nina Ilic. Archaeological Site Record for P-43-000649 (CA-SCL-000762). Confidential record on file, Northwest Information Center, California Historical Resources Information System, Rohnert Park. Woodward-Clyde Consultants, Oakland, CA, May 7, 1993.