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Small Power Plant Exemption Application

Charcot Avenue Backup Generating Facility Project



Submitted to

STATE OF CALIFORNIA
ENERGY COMMISSION
SINCE 1975

Prepared by

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Appendix L: Noise and Vibration Assessment
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All appendices are incorporated herein by reference.

Section 1.0 Introduction and Purpose

1.1 Executive Summary

Prologis, L. P. (Prologis) hereby files this Application for a Small Power Plant Exemption (SPPE Application) pursuant to Public Resources Code (PRC) Section 25541 and Section 1934 et seq. of the California Energy Commission (Commission) regulations for the 99-megawatt (MW)[1] Charcot Avenue Backup Generating Facility (CABGF). The CABGF will consist of a total of 44 diesel-fired generators that will be used exclusively to provide up to 99 MW of backup emergency generation to support the Charcot Avenue Data Center (CADC). The CABGF and CADC will be located at 326 Charcot Avenue in San José, California (referred to herein as the "CABGF/CADC Site"). Of the 44 diesel-fired generators, two of the generators will be used to support general office loads along with building and life safety services (house generators) in the case of a loss of utility power, while the remaining 42 generators (emergency generators) will be dedicated to replacing the electricity needs of the data center.

Unlike the typical electrical generating facility reviewed by the Commission, the CABGF is designed to operate only when electricity from Pacific Gas & Electric Company (PG&E) is unavailable to the CADC. The CABGF will not be electrically interconnected to the electrical transmission grid. Rather, it will consist of one generation yard electrically interconnected solely to the CADC.

Section 2 of the SPPE Application provides project information such as the project title, lead agency contact, project applicant, project location, assessor's parcel number, and general plan and zoning designations.

Section 3 of the SPPE Application provides a detailed description of the construction and proposed operation of the CABGF. To describe the context of the CABGF and its role in serving the CADC, Section 3 also includes a general description of the CADC and the facilities to be constructed by PG&E to serve the CADC (PG&E Facilities).

Section 4 of the SPPE Application includes environmental information and analyses with sufficient detail to allow the Commission to prepare an Environmental Impact Report or Mitigated Negative Declaration consistent with the CEQA Guidelines.

Section 5 of the SPPE Application includes a discussion of growth-inducing impacts resulting from the Project.

Section 6 of the SPPE Application contains a discussion of significant and irreversible environmental changes that would result from implementation of the Project.

[1] Maximum electrical demand of the CADC.

Section 7 of the SPPE Application contains a discussion of significant and unavoidable impacts from the Project.

Section 8 of the SPPE Application includes a discussion of Prologis site selection criteria, alternative backup generation configurations, technology alternative fuels considered by the Project Applicant. In addition, this section includes a discussion of the reduced capacity and the No Project Alternative.

Section 9 of the SPPE Application includes a list of references used in the SPPE Application.

Section 10 of the SPPE Application includes a list of agency contacts with permitting jurisdiction for the Project and consultants that prepared the SPPE Application.

Section 11 of the SPPE Application includes a list of acronyms and abbreviations used throughout the SPPE Application.

Section 12 of the SPPE Application contains a map of properties and a list of addresses of the property (and owners where different from the property address) within 1,000 feet of the project site and 500 feet of off-site linear facilities for Commission noticing purposes.

1.2 Project Objectives and Need For Backup Generation

The primary goal of the CADC is to be a state-of-the-art data center that provides greater than 99.999 percent reliability. The CADC has been designed to reliably meet the increased demand of digital infrastructure, its customers, and its continued growth. The CADC's purpose is to provide its customers with mission critical space to support their servers, including space conditioning and a steady stream of high-quality power supply. Interruptions of power could lead to server damage or corruption of the data and software stored on the servers by Prologis' clients.

To ensure a reliable supply of high-quality power, the CABGF was designed to provide backup electricity to the CADC only in the event electricity cannot be supplied from PG&E and delivered to the CADC building. To ensure no interruption of electricity service to the servers housed in the CADC building, the servers will be connected to uninterruptible power supply (UPS) systems that store energy and provide near-instantaneous protection from input power interruptions. However, to provide electricity during a prolonged electricity interruption, the UPS systems will require a flexible and reliable backup power generation source to continue supplying steady power to the servers and other equipment. The CABGF provides that backup power generation source.

The CADC's Project Objectives are as follows:

1. Develop a state-of-the-art data center large enough to meet tenant demands and market conditions to the maximum extent feasible consistent with local regulatory and technological constraints.

2. Develop the CADC on land that is zoned to allow data center use at a location acceptable to the City of San José;
3. Develop the CADC close to existing PG&E infrastructure where adequate electricity is available in a cost effective and timely manner;
4. Develop the CADC on property owned by Prologis, consisting of a min of 10 acres where existing uses are not providing the highest and best use for the property (taking into account lease terms and building conditions on sites with existing buildings)
5. Incorporate the most reliable and flexible form of backup electric generating technology into the CABGF considering the following evaluation criteria.
    - **Reliability**. The selected backup electric generation technology must be extremely reliable in the case of an emergency loss of electricity from the utility.
        - The CABGF must provide a higher reliability than 99.999 percent in order for the CADC to achieve an overall reliability of equal to or greater than 99.999 percent.
        - The CABGF must provide reliability to the greatest extent feasible during natural disasters including earthquakes.
        - The selected backup electric generation technology must have a proven built-in resilience so if any of the backup unit fails due to external or internal failure, the system will have redundancy to continue to operate without interruption.
        - The CADC must have on-site means to sustain power at full load for the data center for 24-hours minimum in failure mode, inclusive of utility outage.
    - **Commercial Availability and Feasibility**. The selected backup electric generation technology must currently be in use and proven as an accepted industry standard for technology sufficient to receive commercial guarantees in a form and amount acceptable to financing entities. It must be operational within a reasonable timeframe where permits and approvals are required.
    - **Technical Feasibility**. The selected backup electric generation technology must utilize systems that are compatible with one another.

1.3 Commission SPPE Jurisdiction

Prologis acknowledges that the Commission's authorizing statute grants exclusive authority for the Commission to issue licenses for the construction and operation of thermal power plants with generating capacities in excess of 50 MW.[2] For thermal power plants with generating capacities greater than 50 MW but less than 100 MW, the Commission can grant an exemption from its licensing authority.[3] The CABGF is not a typical power generating facility in that it consists of

[2] PRC Section 25500
[3] PRC Section 25541 and Title 20 California Code of Regulations (CCR) Section 1934

generators that can operate independently. In addition, the generators are arranged to support individual portions of the building within the CADC. None of the generators will be interconnected to the electrical transmission system and therefore no electricity can be delivered off site.

1.3.1 Data Center Facilities Not Within Scope of SPPE

The CADC is not within the scope of the Commission's siting jurisdiction because it is neither a related nor appurtenant facility to the thermal power plant (the CABGF).[4] The CADC is the sole consumer of the electricity produced by the CABGF. Prologis is submitting a development application to construct and operate the CADC to the City of San José for review. The City began its preliminary review in May 2026.

As outlined in a recent SPPE Decision for the Pittsburg Backup Generating Facility, although the Commission is the lead agency for making a determination of whether the CABGF is a thermal power plant that can qualify for a SPPE, the ultimate decision does not extend to the CADC or utility facilities. The findings necessary for granting an SPPE are limited to the CABGF because (1) it is the thermal power plant and (2) the CADC, the Trimble Substation Expansion and the PG&E transmission lines[5] are not related or appurtenant facilities to the CABGF. Prologis does acknowledge that the Commission should include the potential effects of the CADC, and the PG&E Facilities in the analysis the Commission prepares as lead agency for CEQA. However, the ultimate determination of whether the CADC should be approved, denied, or subject to mitigation measures is solely within the City's jurisdiction. To assist the Commission in preparing its CEQA document, Prologis includes a description of the CADC and its supporting facilities and PG&E Facilities in addition to the CABGF in Section 3 of this SPPE Application. The potential effects of the CADC and PG&E facilities are considered in the environmental analyses of Section 4 of this SPPE Application in a manner to assist the Commission in evaluating the impacts of the CABGF for its own SPPE decision and to allow the City of San José to use the CEQA document as a responsible agency to support its decision on whether or not to approve the CADC and the CABGF.

To enable the City of San José to complete a timely review of the CADC, Prologis requests the Commission complete its CEQA document and make a decision to grant the SPPE by September 2027 or sooner. Applications for the emergency generator permits will be submitted to the Bay Area Air District (Air District) shortly after the SPPE process is completed and are expected to be issued in 2027.

1.4 Project Benefits and Efficiency Measures

The CADC provides much needed data center infrastructure for an increasingly more internet and data driven society. The CADC has been designed to:

[4] CEC Rulemaking 25-RULE-01, TN 266224.
[5] The Trimble Substation Expansion and PG&E transmission lines make up the PG&E Facilities.

- Negligibly use water.
    - Project utilizes air-cooled chillers with a closed water loop for heat rejection.
- Use Renewable Diesel as the primary fuel source for the backup generators,
- Participate in a program for 100 percent carbon free electricity to power the data center,
- Minimize emissions by performing generator maintenance and testing on one generator at a time,
- Operate the backup generators only when there is an interruption of utility service to the site and not for demand response or other grid-related purposes,
- Incorporate noise minimization measures,
- Incorporate water efficiency measures, and
- Propose a Class A building with an attractive, modern architectural aesthetic featuring high-quality insulated metal panels, prominent glazed curtain wall, and integrated landscaping that enhances the project's visual presence along Charcot Avenue and Zanker Road.

Due to the heat generated by the data center IT equipment, cooling is one of the main uses of electricity in data center operations (data center IT equipment is the largest electrical use) In order to reduce greenhouse gas (GHG) emissions and reduce the use of energy related to building operations, the Project proposes to implement the following efficiency measures:

- Daylight penetration to office space
- LED lighting fixtures and occupancy sensors
- Reflective roof surface
- Meet or exceed Title 24 requirements meeting LEED Silver
- Electric vehicle (EV) parking
- Low flow plumbing fixtures
- Landscaping meeting City requirements for low water use
- Recycled water for irrigation
- Use of low GHG emission refrigerant in the project chillers
- Insulated wall panels and enhanced insulation systems, or equivalent measures, to reduce thermal energy loss through the exterior walls.

1.5 California Energy Commission Data Adequacy Worksheets

The Commission has three different approval processes for backup generating facilities including: 1) Power Plant Licensing Application for Certification (AFC), 2) Opt-In Certification Program (Opt-in), and 3) SPPE Application. The standards for the review and approval of SPPE projects are

significantly different than those required for AFC and Opt-In projects. These differences are clarified below.

The approvals for AFC and Opt-in projects require findings related to two analyses: CEQA and Laws, Ordinances, Regulations, and Standards (LORS). The Commission is required to evaluate: (1) whether the project would result in significant environmental impacts pursuant to its CEQA Certified Regulatory Program and (2) whether or not the project will comply with all applicable LORS. For AFCs and Opt-In processes, the LORS review is required in addition to its CEQA obligation, because the license the Commission issues is in-lieu of any state or local permit and the Commission is the Chief Building Official.

For SPPE projects, the Commission's review and approval is based solely on CEQA review. A LORS review is not required because the Commission does not issue a license in-lieu of other state or local permits. The project obtains permits from the local municipality and local air district. To grant a SPPE, the Commission must make a finding that the backup generating facility does not result in significant and unavoidable environmental impacts (i.e., unmitigable impacts). To support this finding, the Commission as the lead agency pursuant to CEQA will prepare an Environmental Impact Report (EIR) or an Initial Study/Mitigated Negative Declaration (IS/MND).

The Commission utilizes the information required in the California Code of Regulations Title 20, Division 2, Chapter 5, Appendix B (Appendix B) regulations to evaluate, approve and ultimately regulate powerplants. Appendix B includes requirements necessary for the analysis of both the potential environmental impacts pursuant to CEQA and compliance with LORS. The Commission developed the Data Adequacy Worksheet tool for both AFC and Opt-In projects. The worksheet helps Staff determine whether the Appendix B information necessary for both CEQA and LORS has been provided and Staff may begin proceedings.

Recently, Staff began using these same worksheets on SPPE Applications for data center backup generating facilities. However, not all of the information outlined in Appendix B and the worksheet are applicable or necessary to enable the Commission Staff to prepare a legally sufficient CEQA document for an SPPE Application (as LORS analysis is not required). In each environmental section of this application, an analysis is included that answers the CEQA Guideline questions necessary for a CEQA analysis. To assist the Commission in conducting its analysis, we have included data adequacy worksheets as Appendix A to this SPPE Application. The data adequacy worksheets contain detailed references as to where in this SPPE Application the information requested appears and also include explanations for why some of the information is not provided.

Section 2.0 Project Information

2.1 Project Title

Charcot Avenue Backup Generating Facility

2.2 Project Applicant

Prologis, L. P.
2141 Rosecrans Avenue, Suite 1151
El Segundo, CA 90245
Attn: Claudia Tarpin, Director of Development

2.3 Project Location

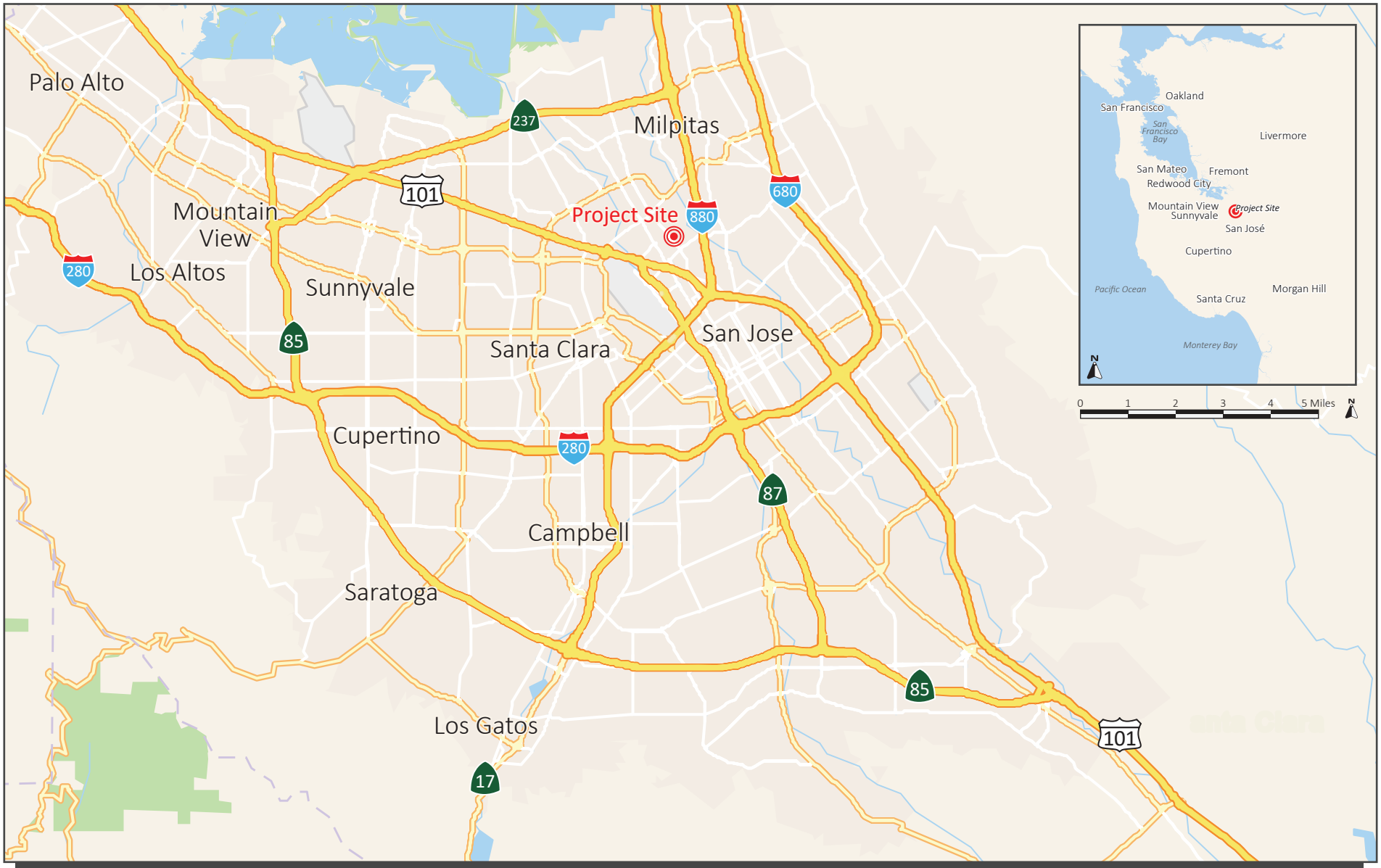
The approximately 12.88-acre CABGF/CADC Site is located at 326 Charcot Avenue in San Jose, California. The PG&E Trimble Substation Expansion Site is approximately 10-acres and is located at 44467 Component Drive in San Jose, California. Refer to Figure 2.5-1 through Figure 2.5-3 for the Regional, Vicinity, and Aerial maps, respectively.

2.4 Assessor's Parcel Number

The CABGF/CADC Site consists of two parcels - Assessor's Parcel Numbers (APN) 237-29-029 and 237-29-030. The Trimble Substation Expansion Site APN is 101-02-011.

2.5 General Plan Designation and Zoning District

The CABGF/CADC Site and Trimble Substation Expansion Site are designated Industrial Park in the City of San José Envision San José 2040 General Plan (General Plan) and located in the Industrial Park zoning district.



REGIONAL MAP

FIGURE 2.5-1

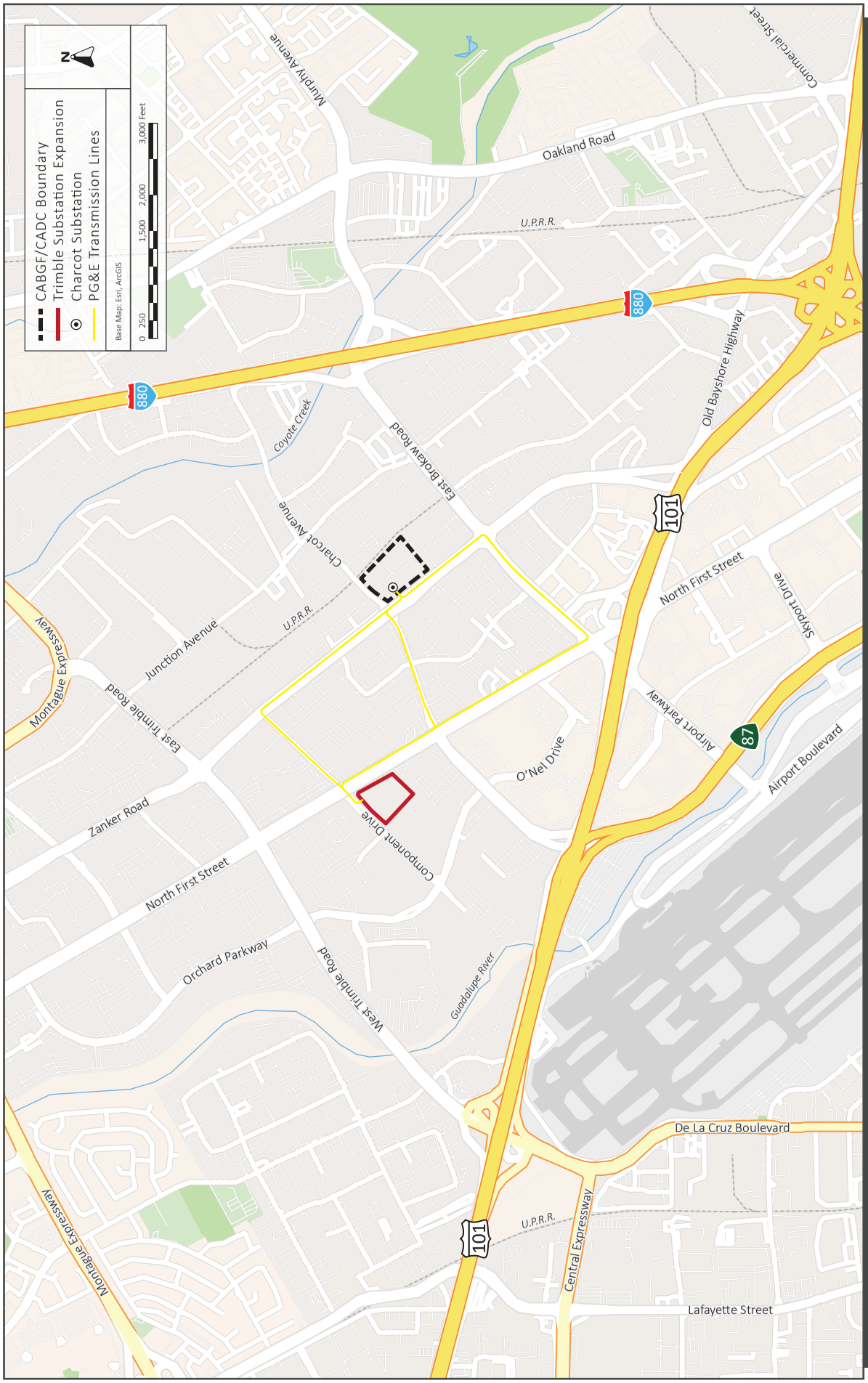
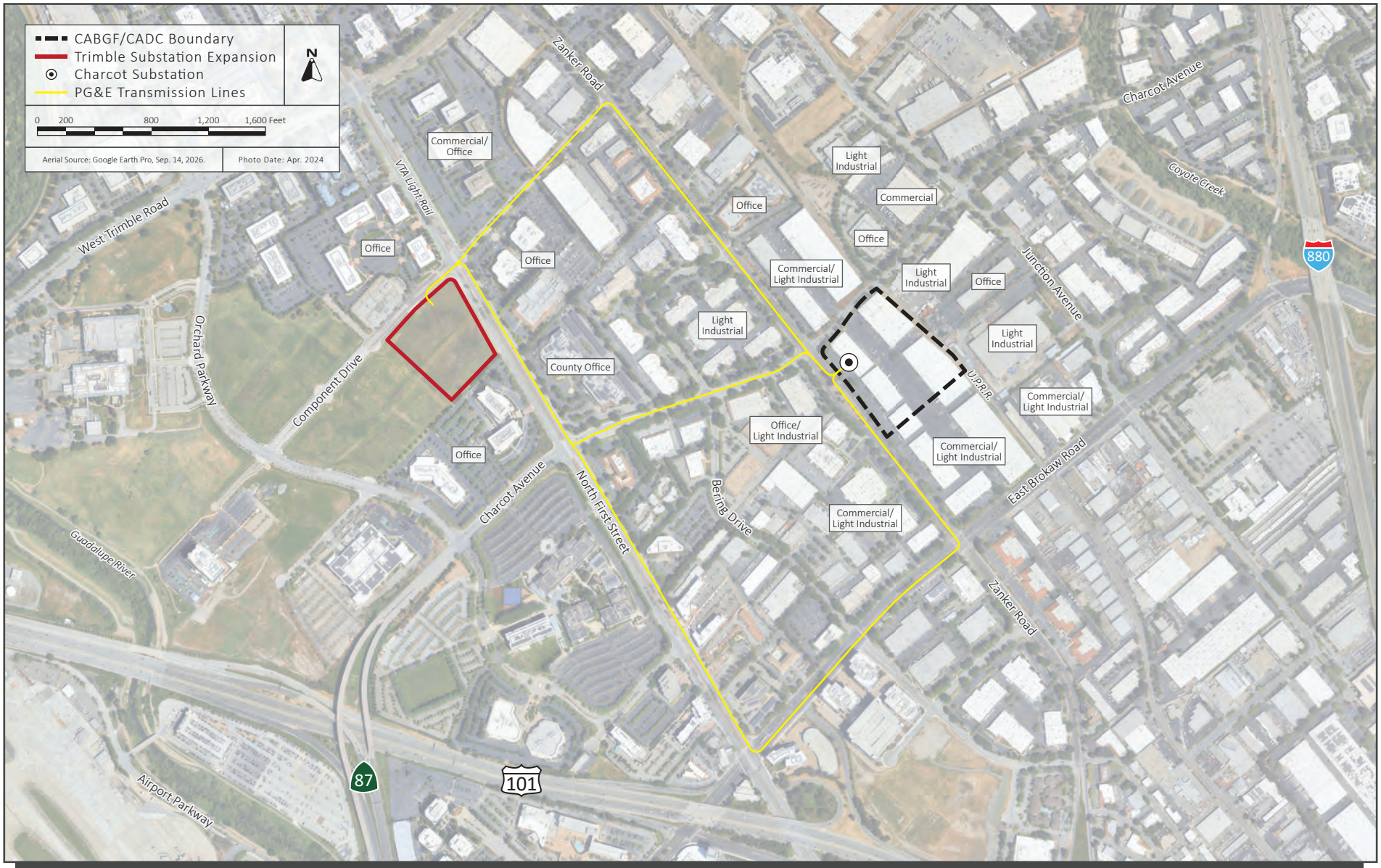


FIGURE 2.5-2

VICINITY MAP



AERIAL AND SURROUNDING LAND USE MAPS | FIGURE 2.5-3

Section 3.0 Project Description

3.1 Overview of Proposed Generating Facilities

The CABGF will be an emergency backup generating facility with a generation capacity of up to 99MW to support the need for the CADC to provide uninterruptible power supply for its tenants' servers. The CABGF will consist of 44 diesel-fired emergency generators arranged in a generation yard located on the west side of the CADC. Of the 44 emergency generators, 42 of the generators (with each having a three-MW capacity) would be dedicated to replacing the electricity needs of the data center and the remaining two emergency generators (with each having a 1.5-MW capacity) would be used to support general office loads and network loads, along with building and life safety services in the case of a loss of utility power.

3.2 Generating Facility Description, Construction and Operation

3.2.1 Site Description

The proposed CABGF/CADC site encompasses approximately 12.88 acres and is located at 326 Charcot Avenue on the southeast corner of the intersection of Charcot Avenue and Zanker Road in San Jose, California. The CABGF/CADC Site is a rectangular set of two parcels that is currently developed with five light industrial and warehouse buildings totaling approximately 301,064 square feet. All of the existing five buildings within the CBGF/CADC Site will be demolished and Prologis has requested the City approve a lot merger and a lot line adjustment to create the boundaries of the CABGF/CADC Site.

The CABGF/CADC Site is surrounded by light industrial uses to the north, south, east, and west. There is also a rail line along the east property line. The nearest residence is located to the east approximately 0.8 miles from nearest CABGF/CADC Site boundary. Refer to Figure 2.5-3 for the project site in relation to the surrounding uses.

The CABGF/CADC Site is designated as Industrial Park (IP) per the City of San José Envision San José 2040 General Plan (General Plan). This land use designation allows for a variety of industrial uses, such as research and development, manufacturing, assembly, testing, and offices. The CABGF/CADC Project Site is located in the IP zoning district. The IP zoning district (similar to the IP land use designation) is established with specific development standards intended to ensure development is compatible with surrounding uses and implements the site's General Plan land use designation. In the IP zoning district, the City of San José's Zoning Ordinance permits data centers with a Special Use Permit and emergency generators with an Administrative Use Permit.

The CABGF/CADC Site is completely developed with trees generally located along Charcot Avenue and Zanker Road frontages.

3.3 General Site Arrangement and Layout

The 44 emergency backup generators (two emergency generators for administrative purposes [house generators] and 42 emergency generators for the data center suites) will be located at the site in a generation yard adjacent to the west side of the CADC building. Appendix B, Sheet Plan A1.1 shows the overall site plan for the CABGF/CADC Site and Sheet Plan A2.1 shows the CABGF in relation to the first floor of the CADC. The generation yard will be electrically connected to the CADC building through above ground or in trenched cable bus to a location within the building that houses electrical distribution equipment.

3.3.1 Generating Capacity

3.3.1.1 *Overview*

In order to determine the generating capacity of the CABGF, it is important to consider and incorporate the following critical and determinative facts.

1. The CABGF will use internal combustion engines and not turbines.
2. The CABGF internal combustion engines will have a peak rating and a continuous rating.
3. The CABGF will be controlled exclusively by the CADC through software technology and electronic devices.
4. The CABGF has been designed with multiple distributed redundant systems, each with a 7-to-make-6 system redundancy.
5. There will be a total of six redundant generators to support the CADC.
6. There will be a total of two generators to provide electricity during emergencies to support portions of the administrative building and features necessary for emergency response.
7. The CABGF will only be operated for maintenance and testing and during emergency utility power outages and will not operate for any demand response program.
8. The CABGF will only operate at a load equal to the demand of the CADC during an emergency utility outage.
9. The CABGF will only be interconnected to the CADC and will not be interconnected to the transmission or distribution grid.

3.3.2 Generating Capacity and PUE

The Commission has determined the maximum generating capacity of a backup generating facility is the maximum capacity of the load being served. The design demand of the CADC (which the CABGF has been designed to reliably supply with redundant components during an emergency) is based on the maximum critical information technology (IT) load and maximum mechanical cooling electrical

load occurring during the hottest hour in the last 20 years. While these specific conditions could happen, it is extremely unlikely to ever occur. The CADC load on that worst-case day will be 99 MW.

The data center industry utilizes a factor called the Power Utilization Efficiency Factor (PUE) to estimate the efficiency of its data centers. The PUE is calculated by dividing the total demand of the data center infrastructure serving the critical IT spaces (including IT load) by the critical IT load itself. The theoretical peak PUE for the Worst Day Calculation would be 1.43.[6] The average annual PUE at full load would be 1.29.[7] These PUE estimates are based on design assumptions and represent worst case.

3.4 Backup Electrical System Design

3.4.1.1 *Overview*

There will be six data center suites in the CADC. Each data center suite will be designed to handle 11.53 MW of IT equipment load, which includes the IT equipment load, mechanical equipment to cool the IT equipment load, lighting, and data center monitoring equipment. The sum of the six center suites will result in 69.2 MW of critical IT equipment load and 99 MW of total electrical load.

There will be 42 electrical lineups supporting the data center suites. Each electrical lineup will have an electrical capacity of three MW (3,000 kilowatts [kW]) of total power. An electrical lineup consists of one 3,000 kW generator, one 3,360 kilovolt-ampere (kVA) 34.5-kilovolt (kV)-480-volt (V) medium voltage transformer, one 4,000 ampere 480-volt service switchboard, two 1,000-kW uninterruptible power supply (UPS) systems, and a downstream distribution method. Each electrical system will be designed to serve the suites in groups. A data center suite will be served by a group of seven three-MW emergency generators. Each group of seven three-MW emergency generators will be designed for redundancy with the assumption that one electrical lineup could be taken out of service at any moment in time. This redundancy is called the 7-to-make-6 system. The 7-to-make-6 system is being designed as a Block Redundant design. This means, of the 7-to-make-6 electrical systems, six emergency generators will be designed to be the primary power source and support all the IT equipment load in the data center suite they serve. The seventh emergency generator will act as a reserve system and will provide power any time one of the six primary electrical lineups is either scheduled to be out-of-service for maintenance or becomes unavailable due to equipment failure. Therefore, the 14 MW of total power equipment capacity installed for each 7-to-make-6 system effectively provides only 12 MW of total power. During a utility outage all seven three-MW generators will start.

The electrical load on each electrical capacity group is monitored by the building automation system. When any of the electrical capacity groups reach 72 percent loaded (based on 90 percent of the 80 percent maximum loading under normal operation), an alarm is activated in the engineering

[6] Total 99 MW demand of the CADC on Worst Case Day divided by 69.2 MW Total Critical IT Load
[7] Total 89.3 MW demand of the CADC average conditions divided by 69.2 MW Total Critical IT Load

office. The operations staff will work with the tenants to ensure that the facility power levels are not exceeded.

The consequence of electrical capacity groups exceeding 80 percent load could lead to dropping IT equipment when coupled with a capacity group failure event. If all the capacity groups serving a data center suite (six capacity groups) are loaded over 80 percent and an electrical capacity group fails, the resulting load transferring to the five available capacity group would exceed the rating of the capacity groups and would lead to over-current protection devices tripping open due to the overload condition. Therefore, it is vital to the reliability of the data center to make sure that all capacity groups remain below the 80 percent threshold.

3.4.1.2 *Utility-to-Generator Transfer Control Components and Logic*

In a switchboard located next to the generator alternator, there will be a load disconnect breaker that is normally closed while the emergency generator is both in and out of operation. From that load disconnect, power will be brought into the data center facility terminating on a dedicated main generator input breaker on the lineup main switchboard.

This generator main breaker will be electrically interlocked with an adjacent utility transformer main breaker to allow only one of the breakers to be closed at any time. Upon the loss of utility power, the programmable logic controllers transfer controller will send a start signal to the generator, followed by the utility breaker opening, followed by a confirmation that the generator has started leading to the generator main breaker being closed.

Once the generator main breaker is closed, the power created from the individual generator will then then be transmitted to the IT equipment via a two-MW (2,000 kW) UPS system and to mechanical equipment designed to cool the IT equipment load served by the UPS. This load is the same load that the dedicated utility transformer was supplying power to prior to the utility interruption. Power from this individual generator cannot be transferred to any other load or system, or anywhere outside the facility.

The UPS system will include back-up batteries sized for five minutes of battery back-up time. During the time between a transfer between utility and generator power, the UPS system will continue to support the IT equipment load without interruption. During a utility-to-generator transfer, the duration of the power outage between the sources will typically be around 15 seconds since it takes around ten seconds to get the generator started and up to voltage. During a generator-to-utility transfer, the duration of the power outage between the sources will typically be around five seconds. During this period, the IT loads will be supplied by the UPS.

3.4.1.3 *Uninterruptible Power Supply System*

The UPS System and Batteries are part of the CADC and are not part of the CABGF; however, the following description is provided to describe how the UPS system is intended to operate. The UPS

will protect the load against surges, sags, under voltage, and voltage fluctuation. The UPS will have built-in protection against permanent damage to itself and the connected load for all predictable types of malfunctions. The load will be automatically transferred to the bypass line without interruption in the event of an internal UPS malfunction. The status of protective devices will be indicated on an LCD graphic display screen on the front of the UPS. The UPS will operate in the following modes:

- **Normal** – Insulated Gate Bipolar Transistor (IGBT) rectifier will convert alternating current (AC) input power to direct current (DC) power for the inverter and for charging the batteries. The IGBT inverter will supply clean and stable AC power continuously to the critical load while regulating power factor and minimizing total harmonic distortion. The UPS Inverter output will be synchronized to the bypass AC source when the bypass source is within the AC input voltage and frequency specifications.
- **Loss of Main Powe**r - When main power is lost, the battery system will automatically feed the inverter so there is no interruption of AC power to the critical load.
- **Return of Main Power or Generator Power** - The system will recover to the normal operating mode and will cause no disturbance to the critical load while simultaneously recharging the backup battery.
- **Transfer to Bypass AC source** - If the UPS becomes overloaded, or an internal fault is detected, the UPS controls will automatically transfer the critical load from the inverter output to the bypass AC source without interruption. When the overload or internal warning condition is removed, after a preset “hold” period, the UPS will automatically re-transfer the critical load from the bypass to the inverter output without interruption of power to the critical load.
- **Maintenance Bypass** - A manual make-before-break maintenance bypass panel will be provided to electrically isolate the UPS for repair, maintenance, or test without affecting the operation of critical load.

The UPS system batteries will have tab washers mounted on front terminal posts capable of accepting the wiring components of a battery monitoring system. Batteries will have an expected life of ten years. Each battery bank will provide a minimum of five minutes of backup at 100 percent rated inverter load of 2000 kW at 77 degrees Fahrenheit (25 degrees Celsius), 1.67 end volts per cell, end of life.

3.4.2 Generator System Description

Each of the 42 large generators will be Caterpillar Model 3516E standby emergency diesel fired generators. The two smaller house generators will be Caterpillar Model 3512C standby emergency diesel fired generators. Both the larger and smaller generators will be equipped with SCR equipment and DPF to comply with Tier 4 emissions standards.

The maximum peak generating capacity of each large generator is 3 MW and 1.5 MW for each small generator for standby applications (short duration operation). Under normal operation when all generators are active, the maximum load on each generator is designed to be 80 percent of the peak capacity. Manufacturer specification sheets and performance data for the proposed generators are provided in Appendix C (Caterpillar Model 3516E standby 3-megawatts Emergency Diesel Fired Generator) and Appendix D (Caterpillar Model 3512C standby 1.5-megawatts Emergency Diesel Fired Generator).

Each individual generator will be provided with its own package system. Within that package, the prime mover and alternator will be automatically turned on and off by a utility-generator PLC transfer controller located in the 480-volt main switchboard located within the CADC. Each generator will be controlled by a separate, independent transfer controller. The generator will be turned on if the electrical utility power becomes unavailable and will be turned off after utility power has been restored and the transfer controller has returned the utility to the active source of power serving the computer and mechanical loads within the CADC.

The generator package will integrate an SCR and Diesel Exhaust Fluid (DEF) tank. The generators will be constructed in a stacked configuration as shown on Sheet Plan A3.2 and A4.1 in Appendix B. The bottom generators will be placed on a concrete slab, and the upper generators will be supported on a raised structural steel platform. The Cat 3516E generators enclosures will be approximately 13 feet wide, 50 feet long and 24 feet high. The Cat 3512C generator enclosures will be approximately 10 feet wide, 43 feet long and 12 feet high. Each pair of generators will be horizontally spaced approximately seven feet apart. Generators will have stack heights approximately 63 feet above ground level. Each pair of generators will be spaced approximately seven feet apart horizontally.

3.4.3 Fuel System

The backup generators will use renewable diesel as their primary fuel when feasible and ultra-low sulfur diesel as fuel (less than 15 parts per million sulfur by weight) when renewable diesel is not readily available.[8] The bottom generator of each stacked pair will have an approximately 10,400-gallon diesel fuel storage tank to serve both generators. The upper generator in the stacked configuration will have a day tank with a storage capacity of approximately 500 gallons. Approximately 9,700 gallons for a stacked pair of generators are required for 24-hour operation. The generators would have a combined diesel fuel storage capacity of approximately 368,600 gallons, which is sufficient to provide more than 24 hours of emergency generation at full electrical worst-case demand of the CADC.

3.4.4 Cooling System

Each generator will be air cooled independently as part of its integrated package and therefore there is no common cooling system for the CABGF.

[8] See Project Design Measure PDM GHG-1.

3.4.5 Water Supply and Use

The CABGF will not require any consumption of water.

3.4.6 Waste Management

The CABGF will not create any waste materials other than minor amounts of solid waste created during construction and maintenance activities.

3.4.7 Hazardous Materials Management

The CABGF will prepare a Spill Prevention, Control and Countermeasure Plan (SPCC) to address the storage, use and delivery of diesel fuel for the generators.

Each generator unit and its integrated fuel tanks have been designed with double walls. The interstitial space between the walls of each tank is continuously monitored electronically for the existence of liquids. Additionally, the standby generator units are housed within a self-sheltering enclosure that prevents the intrusion of storm water.

Diesel fuel will be delivered on an as-needed basis in a compartmentalized tanker truck with maximum capacity of approximately 17,500 gallons. The tanker truck parks on the access road to the west of the generator yard and extends the fuel fill hose through one of multiple hinged openings in the security fence surrounding the generator equipment yard or via a centralized fueling station located on the exterior of the security fence.

There are no loading/unloading racks or containment for re-fueling events; however, a spill catch basin is located at each fill port for the generators. To prevent a release from entering the storm drain system, storm drains will be temporarily blocked off by the truck driver and/or facility staff during fueling events. Rubber pads or similar devices will be kept in the generation yard to allow quick blockage of the storm sewer drains during fueling events.

To further minimize the potential for diesel fuel to come into contact with stormwater, to the extent feasible, fueling operations will be scheduled at times when storm events are improbable. Warning signs and/or wheel chocks will be used in the loading and/or unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed transfer lines. An emergency pump shut off will be utilized if a pump hose breaks while fueling the tanks. Tanker truck loading and unloading procedures will be posted at the loading and unloading areas. Diesel Exhaust Fluid (DEF) is used as part of the diesel engine combustion process to meet the emissions requirements. Each enclosure will have a 550-gallon DEF gallon tank.

3.4.8 CABGF Project Construction

Construction activities for the CADC are expected to begin in 2027 and are discussed in more detail in Section 3.5.9 CABGF/CADC Site Construction. Since the site preparation activities for the CADC will include the ground preparation and grading of the entire CADC site, the only construction activities for the CABGF would involve construction of the generation yard. This will include construction of concrete slabs, fencing, installation of underground and above ground conduit and electrical cabling to interconnect to the CADC Building switchgear, and placement and securing the generators.

The generators themselves will be assembled off-site and delivered to the site by truck. Each generator will be placed within the generation yard by a crane.

Construction of the generation yard and placement of the generators is expected to take six months and is included in the overall construction schedule for the CADC described in Section 3.5.9 CABGF/CADC Site Construction. Construction personnel for the CABGF are estimated to range from 10 to 15 workers including one crane operator.

3.4.9 CABGF Facility Operation

The backup generators will be run for short periods for testing and maintenance purposes and otherwise will not operate unless there is a disturbance or interruption of the utility supply. The Bay Area Air District's (Air District) Authority to Construct and the California Air Resources Board's Airborne Toxic Control Measures (ATCM) limit each engine to no more than 50 hours annually for reliability purposes (i.e., testing and maintenance). Maintenance and testing of each of the generators are anticipated to be once a month. Each generator will be tested individually during monthly and annual testing. Generators will only be run simultaneously during an emergency utility outage.

3.5 CADC Data Center and PG&E Facilities Description

3.5.1 Overview

As described in Section 1.3 Commission SPPE Jurisdiction, the Commission SPPE's determination is limited solely to the CABGF. However, in order for the Commission to inform the decision-makers of the potential environmental effects of the CABGF, in combination with the CADC, Prologis has included a complete description of the CADC in this SPPE Application. The components of the CADC (Project Components) will include the following.

- A three-story approximately 514,161 square foot data center building,
- A Project Substation,

- PG&E Facilities including the expansion of the existing PG&E Trimble Substation to include Switchgear and connection to the existing Trimble Substation (Trimble Substation Expansion) and transmission and IT Communication lines to the CADC,
- The CABGF,
- Site Access and Surface Parking,
- Landscaping,
- Stormwater controls and features, and
- Utility pipeline interconnections

When applicable, the SPPE Application will refer to the collective components as the "Project" and the location of all components as the "Project Component Sites."

3.5.2 Data Center Building

The CADC project's main component will be a three-story 514,141 square foot data center building that will house computer servers for private clients in a secure and environmentally controlled structure and would be designed to provide 69.7 MW of power to information technology (Critical IT) equipment. Appendix B includes the Preliminary Architectural, Civil, Mechanical, Electrical and Landscaping Plans and Elevation Drawings.

The data center building will consist of two main components: (1) six data center suites that will house client servers and (2) the administrative facilities. The data center suite components will consist of three levels of data center space. Each level will contain two data center suites and corresponding electrical/UPS rooms. The data center is being designed with an average rack power rating of seven kW. The administrative facilities will include support facilities such as the building lobby, restrooms, conference rooms, landlord office space, customer office space, loading dock and storage.

The data center is expected to have between 30 and 45 employees and 12-15 visitors (including deliveries) visit the site per day.[9]

3.5.2.1 *Massing, Heights and Setbacks*

The three-story data hall building will be composed of administrative, data hall, and loading dock masses. The administrative portion will encompass approximately 29,433 square feet and will be located on the north side of the building. The administrative portion will be clad with glass and metal panel systems. The data hall portion will be clad primarily in insulated metal panels and/or Exterior Insulation and Finish Systems (EIFS), or equivalent measures, to reduce thermal energy loss through the exterior walls. The top of the roof will be 75 feet and the top of the parapet of the administrative and data hall will be 82 feet. A rooftop dunnage platform will be provided at 87 feet for mechanical equipment. Access to the platform will be provided by a freight elevator and

[9] The number of employees is at any given time because the CADC operates 24 hours a day, seven days a week.

staircases in the building. The top of the elevator parapet will be 95 feet. Refer to Sheet Plans A3.1 and A3.2 in Appendix B for the exterior elevations from all cardinal directions.

The building will be located near the east of the site, orienting its longer axis north to south, and will be approximately 0.8 miles from the nearest residential property line to the east. The CADC building will be set back a minimum of 326 feet from the property line to the west, a minimum of 50 feet from the property line to the east, a minimum of 42 feet from the property line to the south, and a minimum of 63 feet from the property line to the north (refer to Sheet Plan A1.1 in Appendix B).

3.5.2.2 *Cooling Technology*

Air cooled chillers, operating in a closed-loop system, will be used to remove the heat generated in the data center. They will be sized to be able to carry the full heat load without any water requirement. The air-cooled chillers will not evaporate any water. Conditioned air will cool the IT equipment rejecting heat to Hot Aisle Containment (HAC) and then will migrate into the return air plenum above the ceiling. The heat above the ceiling will be drawn back to the gallery and conditioned by the fan wall units before being distributed back to the data hall. The office and storage areas will be conditioned via variable air volume systems consisting of Roof Top Units connected to interior variable air volume boxes.

3.5.3 Project Substation

The project would construct a new 100 mega volt-ampere (MVA) electrical substation (Project Substation) adjacent to the west side of the data center building as shown on Sheet Plan A1.1 in Appendix B. The two-bay Project Substation (two 100 MVA 115 kV-34.5 kV step-down transformers and primary distribution switchgear) will be designed to allow one of the two transformers to be taken out of service, effectively providing 100 MVA of total power (a 2-to-make-1 design).

The Project Substation will have an all-weather drivable surface. An eight-foot-high chain-like fence will surround all sides of the substation. An oil containment pit surrounding each transformer will capture unintended oil leaks.

The Project Substation will be capable of delivering electricity to the CADC from PG&E's new Trimble Substation Expansion (discussed below) but will not allow any electricity generated from the CABGF to be delivered to the transmission grid. Availability of Project Substation control systems will be ensured through a redundant DC battery backup system.

The Project Substation will use two 123kV, 63kA rated sulfur hexafluoride (SF_6) gas insulated high voltage breakers. These would be procured prior to the January 1, 2028, phase-out-date[10] and

[10] 17 CCR 9532, Table 2

arrive on-site within 24 months of purchase date as required for this class of GIE. A one-line diagram of the Project Substation is included in Appendix E.

3.5.4 PG&E Trimble Substation Expansion and Transmission and IT Communication Lines

3.5.4.1 *Trimble Substation Expansion*

PG&E will expand Trimble Substation located at 44467 Component Drive in the City of San Jose. To ensure safety and security, the project will include installation of an approximately 10- to 20-foot-tall security wall with a guard topper. New substation facilities will be installed within two gas insulated switchgear (GIS) enclosures, each constructed in a breaker and a half (BAAH) configuration to enhance system reliability. The switchgear will be a 115-kV, 63-kA rated gas-insulated switching station with internal high voltage breakers and utilizing SF_6. This equipment would be procured prior to the January 1, 2028, phase out date for SF_6 and arrive on-site within 24 months of purchase date as required for this class of gas-insulated equipment.

The 115 kV GIS enclosure will be approximately 290 feet long and 80 feet wide (20,500 square feet) and approximately 50 feet tall. A second GIS enclosure housing a 230 kV bus will be approximately 120 feet long and 105 feet wide (12,000 square feet) and approximately 35 feet tall. The 230 kV switchgear will include internal high voltage breakers and will accommodate the extension and looping of the Northern Receiving Station–San Jose B 230 kV transmission line, along with installation of two 230 kV/115 kV transformers, two 230 kV bays, and two 115 kV bays with three breakers. Protection upgrades will also be implemented at the remote ends within PG&E's existing Northern Receiving Station Substation and San Jose B Substation. Connections will also be provided for existing 230 kV transmission lines from PG&E's Tesla Substation and Metcalf Substation. Control systems will be powered by a redundant AC system initially provided by two distribution service connections and station service transformers, and later by tertiary connected sources from future 230/115 kV transformers. A DC battery backup system will supply power to critical station control and monitoring systems. PG&E will loop in and extend the existing Los Esteros–Trimble 115 kV and Montague–Trimble 115 kV double circuit power line into the facility. The line extension will be approximately 150 feet and will require installation of approximately two tubular steel pole (TSP) structures ranging from approximately 90 to 100 feet in height.

3.5.4.2 *PG&E Transmission Line Routes*

PG&E has identified three potential new power line routes from the Trimble Substation Expansion to the CADC site for consideration in the Commission's CEQA document. The routes will be either overhead or underground power lines from the Expanded Trimble Substation to the CADC site. The routes being considered run along paved city streets in public right-of-way within PG&E's existing franchise rights. All 3 routes exit the north side of the Expanded Trimble Substation on Component Drive and run east approximately 300 feet to the intersection with North First Street. The routes

terminate at a new project substation to be constructed at the CADC site at 309 E. Brokaw Road. The routes are shown in Figure 3.5-3.

From Component Drive at N. First Street, Route 1 continues east on Component Drive approximately 1,560 feet, goes south along Zanker Road for approximately 3,000 feet, and then turns east into the CADC site. Route 1 is approximately 5,100 feet long (0.97 mile).

Route 2 runs south along N. First Street for approximately 1,500 feet, goes east along Charcot Avenue for approximately 1,800 feet and then turns south on Zanker Road for approximately 825 feet before turning east into the CADC site. Route 2 is approximately 4,600 feet long (0.87 mile).

Route 3 runs south along N. First Street for approximately 4,000 feet, goes east on E. Brokaw Road for approximately 2,050 feet, and then runs approximately 900 feet north on Zanker Road before turning east into the CADC site. Route 3 is approximately 7,500 feet long (1.4 miles).

Underground power lines will be installed in two parallel trenches, one for each circuit, at least 15 feet apart and approximately 5-6 feet deep. Each duct bank will consist of installing four (4) 6-inch polyvinyl chloride (PVC) conduits for power cables, two (2) 4-inch PVC conduits for communication and one (1) 2-inch PVC conduit for the ground continuity conductor. The conduit system will be encased with thermal concrete. The proposed underground power line cable will be per PG&E standard cable sizes, a 115kV 2500kcmil copper conductor cross-linked polyethylene (XLPE) cable. Trenchless crossing methods may be necessary at locations where open-cut trenching techniques may result in environmental impacts (e.g., river crossings, traffic impacts on highways, railroad closures, etc.). Typically trenchless crossings are accomplished with a horizontal directional drill or jack and bore method. Both crossing methods require setting up equipment on both sides of the crossing and then installing a steel, or high density polyethylene (HDPE) pipe, fiberglass reinforced casing between the bore pits. The pipe ends would then be connected with the open-cut trenches adjacent to the crossing.

If constructed as an overhead line, conductors and fiber optic communication lines will be supported by wood poles, light-duty steel poles (LDSPs), or tubular steel poles (TSPs) ranging in height from 70-120 feet tall. Structures will average approximately 400-600 feet apart, and depending on which route is built, be comprised of 12-18 structures. Wood poles and LDSPs are direct-buried structures installed with an auger to excavate a hole generally 24-36 inches in diameter and 10-16 feet deep. The structures are set with a bucket truck or small crane, and framing hardware is installed either while the structure is on the ground or after it is set while working from a bucket truck. Conductors and communication lines are pulled through the structures using reels and pulling equipment and then attached to framing hardware on the structures.

TSPs are set on drilled pier concrete foundations reinforced with rebar cages. Foundations range in size from 4 to 10 feet in diameter and 20-50 feet deep. A small crane is used to set TSPs on steel mounting plates on top of the concrete foundations. Framing hardware is installed either while the

TSP is on the ground or after it is set using a small crane or bucket truck. Conductors and communication lines are pulled through the structures using reels and pulling equipment and then attached to framing hardware.

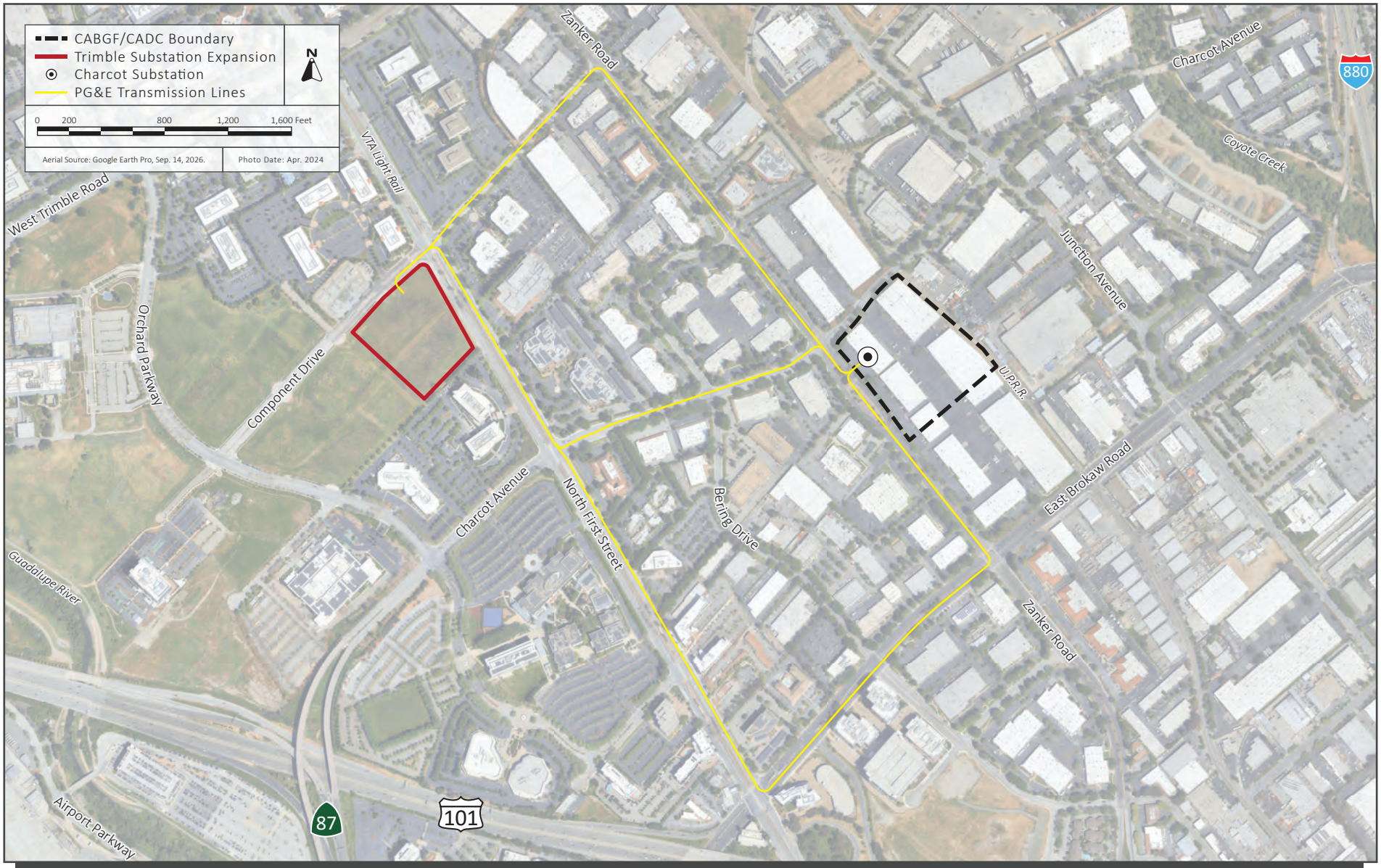
3.5.4.3 *PG&E IT Communication Line Routes*

Two (2) redundant IT Communication lines will be needed between the Expanded Trimble Substation and the CADC site and are described below. The IT communication routes exit the north side of the Expanded Trimble Substation on Component Drive and run east approximately 300 feet to the intersection with North First Street. The routes terminate at a new substation to be constructed at the CADC site at 309 E. Brokaw Road. The routes are shown in Figure 3.5-3.

Depending on the PG&E power line route, the IT communication routes will be installed either overhead on the power line structures or underground in the parallel trenches described in the above "PG&E Power Line Routes" section. The IT communication route will follow the chosen power line route (1, 2, or 3) described above.

If an independent IT communication route is needed to obtain redundancy, the route will follow the path of existing PG&E underground distribution routes between the Expanded Trimble Substation to the CADC site to the greatest extent possible. Limited construction activities may be required, including installation of short conduit connections between existing vaults and/or replacement of degraded or non-functional conduit segments.

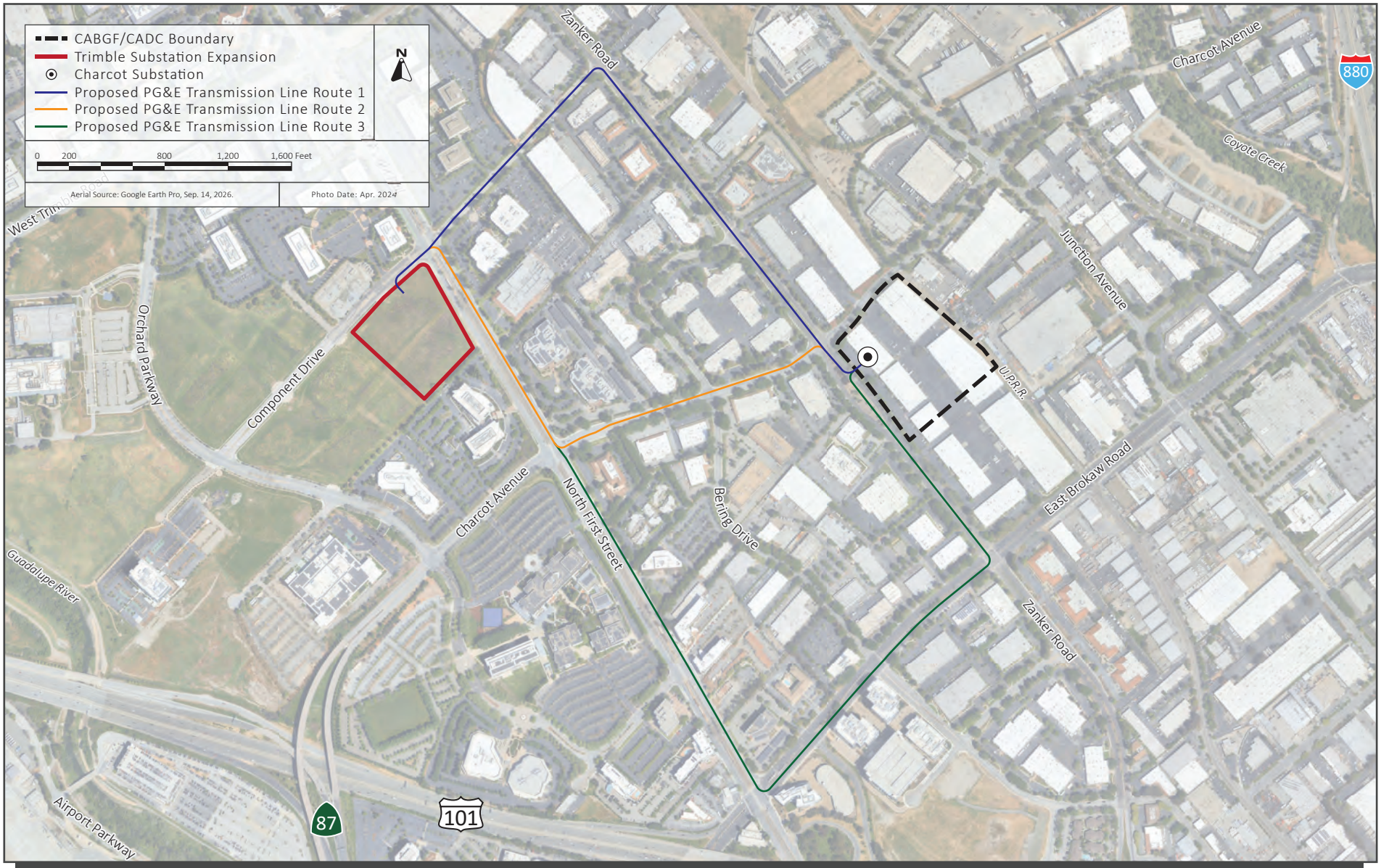
If existing PG&E underground distribution routes are not compatible, a new standalone underground IT communication route will be needed to obtain redundancy. This route would generally follow one of the alignments described in the PG&E Power Line Routes section. Trenching would be approximately 24-36 inches deep and 18-inches wide. The IT communication line would be placed within a 4 inch PVC conduit installed within the trench, followed by backfilling and surface restoration in accordance with applicable standards. Boring will be approximately 36-48 inches deep with a 6-inch bore hole to accommodate a 4-inch HDPE conduit.



PROPOSED PROJECT COMPONENTS | FIGURE 3.5-1

PROPOSED TRIMBLE SUBSTATION LOCATION

FIGURE 3.5-2



PROPOSED TRANSMISSION LINE ROUTES FROM THE TRIMBLE SUBSTATION EXPANSION TO THE CABGF/CADC | FIGURE 3.5-3

3.5.5 CABGF/CADC Site Access and Parking

The entire CABGF/CADC Site will be secured with an eight-foot-high steel security perimeter fence. Access to the CABGF/CADC Site would be provided by two driveways. Primary access to the site would be located on Zanker Road, with a secondary driveway located on Charcot near the intersection of Zanker Rd. for emergency access and PG&E access to the on-site substation. The main driveway on Zanker Road would be equipped with an automatic gate, 24/7 guardhouse, and electronic access control. This main entrance would provide access for employees, visitors, and delivery trucks. Secured pedestrian access to the site would be located on Zanker Road as well, adjacent to the secure vehicle entrance. The secondary entrance would be gated but would not be guarded. The gate will be equipped with a Knox Box that will allow emergency vehicle access 24/7.

A surface parking lot would be provided on the eastern portion of the CABGF/CADC Site. The CADC Project would provide a total of seventy-two (72) parking spaces on site. Sixty-seven (67) would be standard spaces, and five (5) would be accessible spaces. Of the sixty-seven (67) standard spaces, four (4) spaces would be equipped for Electric Vehicle (EV) charging, and an additional seven (7) spaces would be EV capable spaces. Of the five (5) accessible spaces, two (2) would be EV charging accessible spaces. The proposed parking plan conforms to City of San Jose Code and Cal Green Standards. Additionally, the CADC Project would provide up to sixteen (16) bicycle parking spaces, (4) of which would be covered and secured. A truck loading area would be located on the northwest side of the administrative office portion of the CADC building.

3.5.6 CABGF/CADC Site Landscaping

There are a total of 72 existing trees on the CABGF/CADC site. Of the 72 trees, 22 trees will be removed (19 are ordinance-size). A tree removal permit from the City of San José would be required to remove ordinance size trees from the CABGF/CADC site. Sheet Plans L1.1 through L3.5 through in Appendix B show the complete landscape plan and an Arborist Report is included in Appendix G.

3.5.7 CABGF/CADC Site Stormwater Controls and Features

The San Francisco Bay Regional Water Quality Control Board (RWQCB) has issued the Municipal Regional Stormwater NPDES Permit (MRP) to regulate stormwater discharges from municipalities and local agencies. Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). Examples of C.3 LID measures include bioretention areas, flow-through planters, and subsurface infiltration systems.

The CADC proposes to construct stormwater treatment areas consisting of LID (Low-Impact Development) bioretention areas totaling approximately 15,300 square feet, based on preliminary impervious calculations, sized according to the requirements of the MRP. The stormwater treatment areas will be located around the perimeter of the site, and adjacent to paved parking areas. The Project would decrease impervious areas on the CABGF/CADC Site from 484,254 sf to 346,677 sf and would increase pervious areas from 76,789 sf to 214,456 sf.

The CABGF/CADC Site is fully developed land with two storm drain laterals along Charcot Avenue that serve the existing site. There is also a 42" diameter public storm drain line that crosses west-east through the site within a 15'-wide storm drain easement. That public storm drain line will be relocated around the proposed substation and building. The proposed on-site storm drain system will connect to the existing laterals along Charcot Avenue as well as the relocated 42" public storm drain line. Building roof drainage and pavement runoff will be conveyed to bioretention areas through curb and gutter, valley gutters, and curb notches. The bioretention planters will include perforated underdrains and overflow structures that connect to the on-site storm drain system. The stormwater control pan is shown in Sheet Plan C9.0 in Appendix B.

3.5.8 CADC Utility Interconnections

As part of the construction of the new building, domestic water, fire water, irrigation water, sanitary sewer, electrical, and fiber connections will be made.

3.5.8.1 *Domestic, Fire and Irrigation Water Infrastructure*

As part of the construction of the new building, domestic water, fire water, irrigation water, sanitary sewer, electrical, and fiber connections will be made to existing utilities present in adjacent public streets, as described below.

3.5.8.2 *Sanitary Sewer Infrastructure*

The on-site sanitary sewer, including the building sewer, will connect to an existing eight-inch sewer lateral that connects to the sewer main in Charcot Avenue. Sewer service for the new guard shack at the main vehicular entry will be directed to a public sewer main in Zanker Road. The existing sewer main in Charcot Avenue is fifteen inches. There are multiple sewer mains in Zanker Road; the one the project would tie into is eight inches in diameter. In accordance with City of San Jose standards, the truck dock and trash enclosure will also connect to this on-site sewer.

3.5.9 CABGF/CADC Site Construction

Demolition, site grading, excavation, and construction for the CABGF/CADC Site are anticipated to begin in September 2027. Construction of the CADC and CABGF would be completed either on a single-shift construction schedule (Monday through Saturday, 6:00 AM to 4:00 PM) and proceed for a total of approximately 22 months, or a double-shift schedule (Monday through Saturday, 6:00 AM

to 2:00 PM and 2:00 PM to 10:00 PM) and proceed for a total of approximately 17 months. The peak construction workforce will be approximately 375 workers per month with an average of approximately 250 workers per month. This workforce estimate includes the workers necessary to construct the CABGF and the PG&E Facilities.

The proposed CABGF/CADC Site grading will involve cut and fill operations utilizing cut material as engineered fill; including grindings from existing asphalt and concrete surfaces. Based on preliminary grading designs, it is anticipated approximately 1,100 cubic yards of material will be imported to the site. Maximum cut depths are estimated to be 10 feet below existing grade, particularly for gravity utilities. As recommended in the preliminary geotechnical engineering report contained in Appendix I, the foundation system for the data center building could be an auger cast in place concrete pier system extending at approximately 50-80 feet into underlying formational material or a single mat foundation up to five feet deep. Shallow foundations placed on engineered fill or stable underlying formational material may be used for ancillary support features. The maximum depth below existing grade for any of the drainage facilities (bioretention areas) will be approximately 9 feet below existing grade. Utility pipeline trenches are not expected to exceed 10 feet in depth.

3.5.10 CABGF/CADC Site Water Supply and Use

3.5.10.1 *Construction*

Grading and construction of the CADC including the CABGF and the PG&E Facilities is estimated to utilize 1.75-acre feet of water over the 16-month construction period.

3.5.10.2 *CADC Operation*

As described above in Section 3.4.4 Cooling System, the CADC will use air cooled chillers for cooling needs of the data center. The cooling system will not use water for evaporation. Table 3.5-1, Table 3.5-2, Table 3.5-3 show the approximate water and sewer demand for the CADC site.

Table 3.5-1: Proposed CADC Potable Water Demand

Land Use	Average Daily Demand (gallons per day)	Average Yearly Demand (gallons per year)	Average Yearly Demand (acre-feet per year)
FTE Indoor Demand	1,850	675,250	2.07
DH Humidifier	1,811	660,942	2.02
Total Potable Water Demand	3,661	1,336,192	4.09

Table 3.5-2: Proposed Recycled Water Demand

Land Use	Average Daily Demand (gallons per day)	Average Yearly Demand (gallons per year)	Average Yearly Demand (acre-feet per year)
Irrigation Demand	4,679	1,707,843	5.24

Table 3.5-3: Proposed Sewer Generation

Land Use	Average Daily Generation (gallons per day)	Average Yearly Generation (gallons per year)
Administrative HVAC (condensate water)	165	60,255
Dehumidifier Discharge (condensate non-industrial water)	181	66,065
FTE Indoor Demand	1,850	675,250
Total Demand	2,196	801,570

3.6 Project Design Measures

The following Project Design Measures (PDM) are proposed by Prologis and are incorporated into the design of the Project. They are outlined here to ensure that Commission Staff's assessment of the potential impacts of the Project is completed with these measures in place. These PDMs are also repeated in each environmental technical section where applicable and in many cases are identical to the Mitigation Measures adopted by Staff and approved by the Commission in recent SPPE proceedings.

Air Quality

PDM AIR-1: **Fugitive Dust Best Management Practices**. To incorporate the Bay Area Air District (Air District) recommendations for Best Management Practices (BMPs) to control fugitive dust, the Project Owner shall implement a construction emissions control plan that has been reviewed and approved by the Director of Planning, Building, and Code Enforcement or the Director's designee prior to the issuance of any grading or building permits, whichever occurs earliest. The Project Owner shall implement the following measures during construction:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 5 mph.
- All new roadways, driveways, and sidewalks shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted wood chips, mulch, or gravel.
- Equipment idling times shall be minimized to 5 minutes per the Air Toxics Control Measure (ATCM). Idling time signage shall be provided for construction workers at all access points.
- Properly tune and maintain all construction equipment in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- Minimize the amount of excavated material or waste materials stored at the site.
- Post a publicly visible sign with the telephone number and name of the person to contact regarding dust complaints and the Air District telephone number. The contact person shall implement corrective measures, as needed, within 48 hours, and the Air District shall be informed of any legitimate complaints received to verify compliance with applicable regulations.

Biological Resources

PDM BIO-1: **Pay VHP Burrowing Owl Fees for Impacts on Occupied Nesting Habitat.** The project will pay applicable Santa Clara Valley Habitat Plan (Habitat Plan) burrowing owl fees for the areas of California annual grassland on the Trimble Substation Expansion Site that are permanently lost and located within 0.5-mile of a burrow that has been used for nesting within the three years prior to the start of construction, as mapped in the Habitat Plan's burrowing owl fee zone or based on the results of the project's pre-activity surveys and other surveys regularly performed in the area.

PDM BIO-2.1: **Nesting Season Avoidance.** To the extent feasible, commencement of construction activities shall be scheduled to avoid the nesting season (September 1 through January 31, inclusive). If construction activities are scheduled to commence outside the nesting season, all impacts to nesting birds protected under the Migratory Bird Treaty Act ("MBTA") and California Fish and Game Code would be avoided. The nesting season for most birds in Santa Clara County extends from February 1 through August 31, inclusive.

PDM BIO-2.2: **Preconstruction Survey**. If it is not possible to schedule commencement of construction activities and/or tree removal between September 1 and January 31, preconstruction surveys for nesting birds shall be conducted by a qualified ornithologist to ensure that no nests shall be disturbed during project implementation. These surveys shall be conducted no more than 7 days prior to the initiation of demolition or construction activities or initiation of tree removal and pruning. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, ruderal grasslands, buildings) in and up 300 feet from the impact areas for nests.

PDM BIO-2.3: **Buffer zones**. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, ruderal grasslands, buildings) within 300 feet of the impact areas for nests. If active nests of protected species are found within project impact areas or close enough to these areas to affect breeding success, the ornithologist shall establish a species-specific work exclusion zone around each nest that shall be followed by the contractor. If an active nest is found within a distance that could result in disturbance, the ornithologist shall establish a construction-free buffer zone (typically 300 feet for raptors and 100 feet for other bird species) to prevent nest disturbance. Established buffer zones shall remain in place until all young in the nest have fledged or the nest otherwise becomes inactive (e.g., due to predation). The buffer zone size may be reduced from established levels if supported with nest monitoring by a qualified ornithologist indicating that work activities outside the reduced radius would not impact the nest.

PDM BIO-2.4: **Buffer Monitoring**. Any buffer established under PDM BIO-2.3 shall be monitored on a frequency determined by the project ornithologist to verify compliance. After all young have fledged or the nest otherwise becomes inactive, as determined by the ornithologist, the buffer would no longer be required, and tree removal may occur. If an active bird nest is discovered during demolition or construction, then a buffer zone shall be established under the guidelines specified above.

PDM BIO-2.5: **Reporting.** A report detailing the survey findings and any required buffer zones shall be submitted to the Director of Planning, Building, and Code Enforcement or the Director's designee for review and approval prior to tree removal and the issuance of a grading or demolition permit. The report shall contain maps showing the location of all nests, species nesting, status of the nest (e.g., incubation of eggs, feeding of young, near fledging), and the buffer size around each nest (including reasoning behind any alterations to the initial buffer size). The report shall be provided within 10 days of completing a preconstruction nest survey.

PDM BIO-2.6: **Worker Environmental Awareness Program**. A qualified biologist shall be retained by the project owner/developer to conduct a Worker Environmental Awareness Program (WEAP) training focused on nesting bird protection for all construction personnel prior to the commencement of any ground disturbing activities during the nesting season. The training shall include a description of nesting bird species that may be encountered, regulatory protections under the Migratory Bird Treaty Act and California Fish and Game Code and other state and federal laws protecting birds, survey and buffer requirements during the nesting season, and proper protocols for reporting and avoiding impacts to active nests.

PDM BIO-3: **Minimize Project Lighting.** The Trimble Substation Expansion Site shall implement the following measures to minimize effects of project lighting on burrowing owls that could occupy undeveloped areas adjacent to the Trimble Expansion Site.

- Through a combination of proper fixture selection, low mounting height, glare shielding, and orientation/aiming of light fixtures, the design team shall actively control undesirable spill light towards sensitive habitat areas. All exterior lighting shall be fully shielded to block illumination from shining outward towards undeveloped habitats to the southwest of the Trimble Substation Expansion site, and to prevent the lit portions of these fixtures (i.e., the lamps) from being directed towards these areas.

- Outdoor lighting fixtures shall incorporate lamps with a Correlated Color Temperature of 2700 Kelvin or less.
- The allowed total initial luminaire lumens for the project site is 2.5 lumens per square foot of hardscape.
- The maximum allowed luminaire lumens (i.e., the initial lamp lumens for a lamp, multiplied by the number of lamps in the luminaire) for individual fixtures is limited as follows:
    - Unshielded luminaires at one entry per building: 420 lumens
    - Fully shielded luminaires: 1,260 lumens
    - Unshielded luminaires other than those at main entries: 315 lumens
    - Landscape luminaires: 1,050 lumens
- No shielded directional flood lighting is permitted.
- The BUG backlight and glare ratings of individual project fixtures shall comply with lighting zone LZ-1, Moderate Ambient, as follows:
    - BUG Backlight Rating: B3 more than two mounting heights from the southwest property line, B2 from one to less than two mounting heights from the property line and ideally oriented , B1 from 0.5–1 mounting heights from the property line and ideally oriented, and B0 less than 0.5 mounting height to the property line and ideally oriented.
    - BUG Glare Ratings: G1, or G0 for any luminaire that is not mounted with its backlight perpendicular to any property line within twice the mounting height of the luminaire location.

PDM BIO-4: **Santa Clara Valley Habitat Plan Nitrogen Deposition Fee**. Prior to the issuance of any demolition, grading, or tree removal permit (whichever occurs first), the Project shall pay Santa Clara Valley Habitat Plan nitrogen deposition fees applicable to new trips for the CADC. The Project Applicant shall submit the Santa Clara Valley Habitat Plan Coverage Screening Form to the Director of Planning, Building & Code Enforcement or the Director's designee for approval and payment of the nitrogen deposition fees prior to the issuance of a grading permit.

PDM BIO-5: **Tree Removal Permit**. Prior to any tree removal, a tree removal permit shall be obtained from the City of San José. The removed trees would be replaced according to tree replacement ratios required by the City as outlined in Table 4.4-3.

Table 4.4-3: Tree Replacement Ratios

Circumference of Tree to be Removed	Replacement Ratio - Native	Replacement Ratio – Non-Native	Replacement Ratio - Orchard	Minimum Size of Each Replacement Tree**
38 inches or more	5:1*	4:1	3:1	15-gallon
19 up to 38 inches	3:1	2:1	none	15-gallon
Less than 19 inches	1:1	1:1	none	15-gallon

*x:x = tree replacement to tree loss ratio

Note: Trees greater than or equal to 38-inch circumference measured at 54 inches above natural grade shall not be removed unless a Tree Removal Permit, or equivalent, has been approved for the removal of such trees. For Multi-Family residential, Commercial, and Industrial properties, a permit is required for removal of trees of any size.

A 38-inch tree equals 12.1 inches in diameter.

** A 24-inch box replacement tree = two 15-gallon replacement trees

Single Family and Two-dwelling properties may replace trees at a ratio of 1:1.

- Prior to the issuance of building permit(s), the permittee shall pay Off-Site Tree Replacement Fee(s) to the City for off-site replacement trees in accordance with the City Council approved Fee Resolution in effect at the time of payment for any replacement trees that cannot be located on-site.
- If there is insufficient area on the Project Site to accommodate the required replacement trees, one or more of the following measures shall be implemented, to the satisfaction of the Director of Planning, Building and Code Enforcement or Director's designee. Changes to an approved landscape plan requires the issuance of a Permit Adjustment or Permit Amendment.
    - The size of a 15-gallon replacement tree may be increased to 24-inch box and count as two replacement trees to be planted on the Project Site.
    - Pay Off-Site Tree Replacement Fee(s) to the City, prior to the issuance of building permit(s), in accordance with the City Council approved Fee Resolution in effect at the time of payment. The City will use the off-site tree replacement fee(s) to plant trees at alternative sites.

Cultural Resources

PDM CUL-1.1 **Worker Environmental Awareness Program**. Prior to the commencement of construction, the Project Applicant shall secure the services of a qualified archaeologist and a Native American monitors. The qualified archaeologist shall prepare a workforce environmental awareness program (WEAP), in coordination with the Native American monitor, to instruct construction workers of the obligation to protect and preserve valuable archaeological and Native American resources for review and approval by the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee. This program shall be provided to all construction workers via a recorded presentation and shall include a discussion of applicable laws and penalties under the laws; samples or visual aids of resources that could be encountered in the project vicinity; instructions regarding the need to halt work in the vicinity of any potential archaeological and Native American resources encountered; and measures to for construction workers to notify their supervisor, the applicant, and the qualified archeologist, and the Native American monitor. The Project Applicant shall submit the qualifications of the qualified archaeologist and Native American monitor, as well as an electronic copy of the WEAP to the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee.

PDM CUL-1.2: **Construction Monitoring and Protection Measures**. The Project Applicant shall secure the services of Native American and archaeological monitors to observe excavations of the native soils that underlie disturbed and fill dirt at the project site. The Native American monitor shall be selected based on the following:

- Traditional ties to the area being monitored.
- Knowledge of local Native American village sites.
- Knowledge and understanding of Health and Safety Code, section 7050.5, and Public Resources Code, section 5097.9 et seq.
- Ability to effectively communicate the requirements of Health and Safety Code, section 7050.5, and Public Resources Code, section 5097.9 et seq.
- Ability to work with law enforcement officials and the Native American Heritage Commission to ensure the return of all associated grave goods taken from a Native American grave during excavation.
- Ability to travel to project sites within traditional tribal territory.
- Ability to secure replacement monitors when needed for scheduling conflicts.

- Knowledge and understanding of Title 14, California Code of Regulations, section 15064.5.
- Ability to advocate for the preservation in place of Native American cultural features through knowledge and understanding of CEQA mitigation provisions.
- Ability to read a topographical map and be able to locate site and reburial locations for future inclusions in the Native American Heritage Commission's Sacred Lands Inventory.
- Knowledge and understanding of archaeological practices, including the phases of archaeological investigation.

The qualified archaeologist and Native American monitor shall have authority to halt construction activities temporarily in the immediate vicinity of an unanticipated find in accordance with applicable law and regulations. If, for any reasons, the qualified archaeologist or qualified Native American monitor are not present but construction crews encounter a cultural resource, then all work shall stop temporarily within 50 feet of the find until a qualified archaeologist in consultation with a qualified Native American monitor, have been contacted to determine the proper course of action. The City of San José's Director of Planning, Building and Code Enforcement or the Director's designee shall be notified of any finds during the grading or other construction activities.

PDM CUL-1.3: **Undiscovered Archaeological Resources***.* If archaeological resources are encountered during excavation or grading of the site, all activity within a 50-foot radius of the find shall be stopped, the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee shall be notified, and a qualified archaeologist shall examine the find. Work shall be allowed to continue outside of the 50-foot buffer area. The qualified archaeologist and Native American monitors shall evaluate the find to determine if they meet the definition of a historical, unique archaeological, or tribal cultural resource and make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits for any construction occurring within the above-referenced 50-foot radius. If the finds do not meet the definition of a historical, unique archaeological, or tribal cultural resource, no further study or protection is necessary prior to project implementation. If the find does meet the definition of a historical, unique archaeological, or tribal cultural resource, then it shall be avoided by project activities. If avoidance is not feasible, adverse effects to such resources shall be mitigated in accordance with the recommendations of the archaeological and Native American monitors. Recommendations may include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery shall be submitted to the City of San José's Director of Planning, Building and Code Enforcement or the

Director's designee, Native American Heritage Commission (tribal cultural resources), and the Northwest Information Center prior to issuance of the certificate of occupancy.

The Project Applicant shall ensure that construction personnel do not collect or move any cultural material and shall ensure that any fill soil that may be used for construction purposes does not contain any archaeological materials.

PDM CUL-2: **Stop Work for Human Remains**. If human remains are discovered during excavation or grading of the site, all activity within a 50-foot radius of the find shall be stopped. The Santa Clara County Coroner shall be notified immediately and will determine whether the remains are of Native American origin or an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of the identification. Once the NAHC identifies the most likely descendant(s) (MLD), the MLD(s) will make recommendations regarding proper treatment or disposal, with appropriate dignity, of the human remains and any associated grave goods), which will be implemented in accordance with section 15064.5(e) of the California Code of Regulations, Title 14. The qualified archaeologist shall recover scientifically valuable information, as appropriate and in accordance with the recommendations of the MLD. A report of findings documenting any data recovery shall be submitted to the City of San José Director of Planning, Building and Code Enforcement or the Director's designee, the Northwest Information Center, and the MLD.

Geology and Soils

PDM GEO-1: **Geologic Hazard Best Management Practices**. Consistent with City of San José Standard Permit Conditions related to geological hazards, the Project shall incorporate and implement the following measures during construction:

- To avoid or minimize potential damage from seismic shaking, the Project shall be constructed using standard engineering and seismic safety design techniques. Building design and construction at the site shall be completed in conformance with the recommendations of an approved geotechnical investigation. The report shall be reviewed and approved by the City of San José Department of Public Works as part of the building permit review and issuance process. The buildings shall meet the requirements of applicable Building and Fire Codes as adopted or updated by the City. The Project shall be designed to withstand soil hazards identified on the site and the Project shall be designed to reduce the risk to life or property on site

and off site to the extent feasible and in compliance with the Building Code.

- All excavation and grading work shall be scheduled in dry weather months or, in the alternative, construction sites shall be weatherized.
- Stockpiles and excavated soils shall be covered with secured tarps or plastic sheeting when not in use.
- Ditches shall be installed to divert runoff around excavations and graded areas if necessary.
- The Project shall be constructed in accordance with the standard engineering practices in the California Building Code, as adopted by the City of San José. These standard practices would ensure that the future buildings on the Project Site are designed to properly account for soils-related hazards on the Project Site.

PDM GEO-2.1: **Worker Environmental Awareness Program for Paleontological Resources**. Prior to the start of construction, the Project Applicant shall secure the services of a qualified paleontologist specialist, as defined by the Society of Vertebrate Paleontology. The specialist shall prepare a Worker Environmental Awareness Program to instruct site workers of the obligation to protect and preserve valuable paleontological resources for review by the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee. This program shall be provided to all construction workers via a recorded presentation and shall include a discussion of applicable laws and penalties under the laws; samples or visual aids of resources that could be encountered in the project vicinity; instructions regarding the need to halt work in the vicinity of any potential paleontological resources encountered; and measures to notify their supervisor, the applicant, and the qualified paleontologist specialist.

Prior to the start of any subsurface excavations that would extend beyond previously disturbed soils, all construction forepersons and field supervisors shall receive training by a qualified professional paleontologist, as defined by the Society of Vertebrate Paleontology (SVP 2010), who is experienced in teaching non-specialists, to ensure they can recognize fossil materials and shall follow proper notification procedures in the event any are uncovered during construction. Procedures to be conveyed to workers are halting construction within 50 feet of any potential fossil find and notifying a qualified paleontologist, who shall evaluate its significance.

PDM GEO-2.2: **Stop Work for Paleontological Resources**. If a fossil is encountered, the City shall be notified immediately and a qualified paleontologist shall be retained by

the Project Applicant to examine the fossil, and if determined to be significant and avoidance is not feasible, Project construction shall be halted within a 50-foot radius of the find and the paleontologist shall develop and implement an excavation and salvage plan in accordance with Society of Vertebrate Paleontology standards. The excavation and salvage plan shall be provided to the City for approval prior to implementation. Construction work in the immediate area shall be halted or diverted to allow recovery of fossil remains in a timely manner. Fossil remains collected shall be cleaned, repaired, sorted, and cataloged, along with copies of all pertinent field notes, photos, and maps.

Greenhouse Gas Emissions

PDM GHG-1: **Carbon-Free Energy**. The Project Owner shall participate in the SJCE at the TotalGreen level (i.e., 100% carbon-free electricity) for electricity accounts associated with the Project or participate in a clean energy program that accomplishes the same goals of 100 percent carbon-free electricity as the SJCE TotalGreen Level.

During operation, the Project Owner shall provide documentation to the Director or Director's designee with the City of San José Planning, Building and Code Enforcement of initial enrollment and shall submit annual reports to the Director or Director's designee with the City of San José Department of Planning, Building and Code Enforcement documenting either continued participation in SJCE at the TotalGreen level or documentation that alternative measures continue to provide 100 percent carbon-free electricity, as verified by an independent third-party auditor specializing in greenhouse gas emissions.

PDM GHG-2: **Use of Renewable Fuel**. The Project Owner shall use renewable diesel fuel for the diesel-fired generators to the extent feasible. During an emergency where renewable diesel fuel supplies may be limited, the Project Owner shall document their efforts to secure other vendors of renewable diesel fuel prior to refueling with non-renewable diesel. The project owner shall submit annual reports, beginning after project operations, to the Director or Director's designee with the City of San José Department of Planning, Building and Code Enforcement documenting the amount of renewable diesel used by the generators.

Hazards and Hazardous Materials

PDM HAZ-1.1: In conformance with State and local laws, a visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site buildings to determine the presence of asbestos-containing materials and/or lead-based paint.

PDM HAZ-1.2: Prior to demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, California Code of Regulations (CCR) 1523.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the waste being disposed.

PDM HAZ-1.3: All potentially friable asbestos containing materials ("ACMs") shall be removed in accordance with National Emission Standards for Hazardous Air Pollutants guidelines prior to any building demolition or renovation that may disturb the materials. All demolition activities will be undertaken in accordance with Cal/OSHA standards contained in Title 8 of CCR, Section 1529, to protect workers from exposure to asbestos.

PDM HAZ-1.4: A registered asbestos abatement contractor shall be retained to remove and dispose of ACMs identified in the asbestos survey performed for the site in accordance with the standards stated above.

PDM HAZ-1.5: Materials containing more than one percent asbestos are also subject to Bay Area Air District (Air District) regulations. Removal of materials containing more than one percent asbestos shall be completed in accordance with Air District requirements.

PDM HAZ-2.1: If potentially contaminated soil is discovered during construction activities, soil testing shall be performed to determine whether a Site Management Plan (SMP) shall be prepared. If soil testing identifies contaminants in areas of the Project Site to be disturbed that exceed both published naturally occurring background levels and applicable environmental screening levels (ESL) for the protection of future commercial/industrial workers published by the San Francisco Bay Regional Water Quality Control Board (RWQCB), the Project applicant shall be required to prepare and submit a SMP.

Components of the SMP (if required) shall include, but shall not be limited to:

- A detailed discussion of the site background;
- A description of either capping soils or removal and hauling soils off-site to a licensed non-hazardous or hazardous materials disposal site based on environmental testing of the soil.
- Notification procedures if previously undiscovered significantly impacted soil or free fuel product is encountered during construction;

- Development of cleanup levels as based on Section 4.25.2.3 of the RWQCB's The Water Quality Control Plan for the San Francisco Bay Basin (March 2023, Basin Plan);
- Sampling and laboratory analyses of excess soil requiring disposal at an appropriate off- site waste disposal facility;
- Soil stockpiling protocols; and
- Protocols to manage groundwater that may be encountered during trenching and/or subsurface excavation activities.

The SMP shall be submitted to the RWQCB, Santa Clara County Environmental Health Department, California Department of Toxic Substances Control, or equivalent regulatory agency for review and/or approval (if required). Copies of the approved SMP shall be provided to the Director of Planning, Building, and Code Enforcement or the Director's designee and the Environmental Compliance Officer in the City of San José Environmental Services Department prior to the issuance of any demolition, grading and/or building permits (whichever occurs earliest).

PDM HAZ-2.2: Prior to the issuance of any demolition, grading and/or building permits (whichever occurs earliest), all contractors and subcontractors at the project site shall develop a Health and Safety Plan (HSP) specific to their scope of work and based upon the known environmental conditions for the site prior to project construction. The HSP shall be prepared by an industrial hygienist. The HSP shall be submitted to the Director of Planning, Building and Code Enforcement, or their designee, and the Environmental Compliance Officer in the City of San José Environmental Services Department and implemented under the direction of a Site Safety and Health Officer. The HSP shall include, but shall not be limited to, the following elements, as applicable:

- A description of potential health and safety hazards;
- A description of applicable regulations and standards to be implemented for the project site;
- Provisions for personal protection and monitoring exposure to construction workers;
- Education for workers in the proper use of personnel protection;
- Provisions for Hazard Communication Standard (HAZCOM) worker training and education including information about HAZCOM labeling,
- Copies of Safety Data Sheets for any hazardous materials that may be used on-site;

- Identification of workers, supervisor, and employer health and safety responsibilities; and
- Provisions for the on-site management and/or treatment of contaminated groundwater during extraction or dewatering activities; and
- A description of emergency procedures and identification of responsible personnel to contact in event of an emergency. Include contact information for responsible personnel and other emergency contact numbers.
- Copies of the approved HSPs shall be kept at the Project Site.

PDM HAZ-2.3: Prior to issuance of any grading permits, the Project Owner shall research well records from Valley Water to locate abandoned wells at the site. If the wells are identified, or subsequently encountered during earthwork activities, the wells shall be properly destroyed in accordance with Valley Water Ordinance 90-1.

Hydrology and Water Quality

PDM HYD-1: **Stormwater Best Management Practices.** Consistent with applicable provisions of the General Plan and standard permit conditions, the following measures shall be implemented to prevent stormwater pollution and minimize potential sedimentation during construction include, but are not limited, to the following:

- Burlap bags filled with drain rock shall be installed around storm drains to route sediment and other debris away from the drains.
- Earthmoving or other dust-producing activities shall be suspended during periods of high winds and when other dust reducing measures are ineffective.
- All exposed or disturbed soil surfaces shall be watered at least twice daily to control dust, as necessary.
- Stockpiles of soil or other materials that can be blown by the wind shall be watered or covered.
- All trucks hauling soil, sand, and other loose materials shall be covered and all trucks shall maintain at least two feet of freeboard.
- All paved access roads, parking areas, staging areas, and residential streets adjacent to the construction sites shall be swept daily (with water sweepers).
- Vegetation in disturbed areas shall be replanted as quickly as possible.

- All unpaved entrances to the Project Site shall be filled with rock to remove mud from tires prior to entering City streets. A tire wash system shall be installed if requested by the City.
- The Project Applicant shall comply with the City of San José Grading Ordinance, including implementing erosion and dust control during site preparation and with the applicable City of San José Zoning Ordinance requirements for keeping adjacent streets free of dirt and mud during construction.

Noise and Vibration

PDM NOI-1: **Construction Noise Best Management Practices**. The Project shall implement the following City of San José Standard Permit Conditions related to construction noise:

- Construct solid plywood fences or similar noise reducing mechanism around ground level construction sites adjacent to operational business, residences, or other noise-sensitive land uses.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Prohibit unnecessary idling of internal combustion engines.
- Locate stationary noise-generating equipment such as air compressors or portable power generators as far as possible from sensitive receptors (if any). Construct temporary noise barriers to scree stationary noise-generating equipment when located near adjoining sensitive land uses (if any).
- Utilize “quiet” air compressors and other stationary noise sources where technology exists.
- Control noise from construction workers’ radios to a point where they are not audible at existing residences.
- Prior to the start of construction, notify all directly adjacent business, residences, and other noise-sensitive land uses of the construction schedule, in writing, and provide a written schedule of “noisy” construction activities to directly adjacent land uses and nearby residences (within 500 feet).
- If complaints are received and determined by the City to be valid and excessive noise levels cannot be reduced using the measures above, erect additional temporary noise control measures along surrounding building facades that face the construction sites to the extent feasible.

- Designate a "disturbance coordinator" who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

PDM NOI-2: **Noise Attenuation for Mechanical Equipment**. The Project Applicant shall include noise reduction measures to reduce operational noise levels to meet the City of San José's General Plan Policy EC-1.3 threshold of 55 dBA DNL at the nearest sensitive receptor (i.e., the hotels southwest of the CADC site). Compliance with the 55 dBA DNL threshold shall be achieved through installation of chillers with a maximum sound power level of 99 dBA, in which case no screen wall would be required. Alternatively, the project shall include of a rooftop screen wall and installation of chillers with adequate sound power levels which, in combination with the rooftop screen wall, would achieve the required noise reduction. The rooftop screen shall fully enclose the chillers on all sides. The screen wall shall be constructed with no acoustically significant gaps and shall provide a minimum surface density of three pounds per square foot or greater. A louvered screen wall with acoustical treatments meeting a minimum insertion loss of five dBA and a minimum transmission loss of 15 dB or greater may be used in lieu of a solid screen wall. The following combinations of screen wall height and chiller sound power levels would reduce operational noise below the 55 dBA DNL threshold at the nearest sensitive receptors.

Screen Wall Height (feet)	Chiller Sound Power (dBA)
10	100
12	101
16	102
20	103
24	104

Once the screen wall height and chiller selection are finalized, a qualified acoustic/noise specialist shall prepare an acoustical analysis to demonstrate that the chosen measures would reduce the noise levels at the surrounding noise-sensitive land uses (i.e., southwest hotels) to a level below 55 dBA DNL. The Project Applicant shall submit the prepared acoustical analysis and an engineering-approved site plan showing the noise control measures to the City of San José's Director of Planning, Building and Code Enforcement or the

Director's designee for their review and approval prior to the issuance of building permits.

Transportation

PDM TRN-1: The Project would exceed the industrial VMT employee threshold of 16.53 VMT per employee. Therefore, the Project shall be required to implement the following improvements:

- **Physical Multi-Modal Improvements**. Prior to the issuance of building occupancy permits, the Project Applicant shall implement the following multi-modal improvements to incentivize alternative modes of travel and reduce VMT for the Project Site.
    - Pedestrian network improvements: Fund pedestrian network improvements on a General Plan-designated City Connector located within and beyond 1 mile of the project's frontage. This multimodal infrastructure mitigation measure requires coordination with City staff. City staff will ultimately determine whether there are any appropriate pedestrian network improvements in the project vicinity. Potential improvements to provide pedestrian network improvements could include reconstruction and/or construction of sidewalks not on the project frontage and removing pork-chop islands not on the project corner at the intersection of Zanker Road/Charcot Avenue.
    - Transit accessibility improvements: Fund improvements on surface streets to improve access to transit from the project site. This multimodal infrastructure mitigation measure requires coordination with City staff and/or VTA. City staff and/or VTA will ultimately determine whether there are any appropriate pedestrian network improvements in the project vicinity. Potential improvements to increase transit accessibility could include constructing connecting sidewalks/walkways to/from the transit station.

The multi-modal infrastructure improvements shall be part of a Public Improvement Plan that demonstrates how the multi-modal improvements will be implemented and the schedules for completing the improvements. The Public Improvement Plan shall be reviewed and approved by the Director of Public Works or the Director's designee. The implementation of the multi-modal improvements shall be verified by the Director of Public

Works or the Director's designee prior to the issuance of building occupancy permits.

PDM TRN-2: **Sight Distance.** The project driveway along Zanker Road shall be free and clear of obstructions to ensure a minimum clear sight distance of 360 feet. Red curb shall be striped along both sides of the Zanker Road driveway. A site plan showing the red curb striping shall be submitted to the Director of Planning, Building and Code Enforcement or the Director's designee for review and approval prior to issuance of the Special Use Permit for the data center.

3.7 PG&E Programmatic Measures

Under the California Constitution and the California Public Utilities Commission (CPUC) General Order 131-E, local jurisdictions acting pursuant to local authority are preempted from regulating public utility facilities subject to the CPUC's jurisdiction (see California Constitution Article XII, Section 5, 8; General Order 131-E). For this reason, public utilities are not subject to local land use or discretionary permit requirements. As a result, the CPUC has exclusive jurisdiction over the proposed PG&E off-site infrastructure associated with the project (i.e., Trimble Substation and transmission and IT lines). The CPUC may either issue a Permit to Construct through a discretionary action, in which case the CPUC acts as the Lead Agency under CEQA, or the CPUC may find the project exempt from the requirement to obtain a Permit to Construct, in which case no discretionary action is needed from the CPUC. One of the exemptions from the permit to Construct requirement applies where the CPUC confirms that the environmental impacts of the project have been addressed in a CEQA document and that the CEQA document determined that no significant impacts would result from the PG&E facilities. The intent of this SPPE Application is to provide the necessary information for the CEC to include the proposed PG&E off-site facilities in its CEQA document to assist the CPUC in making its determinations whether the project qualifies for the exemption from the requirement to obtain a Permit to Construct pursuant to General Order 131-E.

Because General Order 131-E precludes the City of San José from regulating the proposed PG&E off-site infrastructure included in the project, the mitigation measures that would be enforced by the City of San José cannot be imposed onto PG&E because PG&E is not the data center applicant. As described throughout this SPPE Application, PG&E is required to implement measures (collectively referred to as PG&E programmatic measures) to reduce impacts associated with its projects, and implementation of those measures is enforced by the CPUC and/or the agency that issued the permit to PG&E that includes the required measures, such as the United States Fish & Wildlife Service (USFWS) in the case of the PG&E's Bay Area Habitat Conservation Plan (HCP) and PG&E's California Department of Fish and Wildlife Incidental Take Permit. Where PG&E programmatic measures either do not address impacts identified in this SPPE Application or are insufficient to reduce impacts to a less than significant level, additional measures, identified as Project Design Measures (PDMs), are identified. These measures shall be implemented by the project applicant and enforced by the City of San José through its authority as the responsible agency under CEQA.

Applicable programmatic measures were identified from PG&E's Bay Area HCP, PG&E's Avian Protection Plan, PG&E's Nesting Bird Management Plan, and the Bay Area Operations & Maintenance Incidental Take Permit (ITP) FEIR (O&M FEIR). Note that the PG&E's Bay Area HCP covers all PG&E O&M activities, minor new construction, and Pipeline Safety Enhancement Plan activities that are related to PG&E's natural gas and electric transmission and distribution systems. A summary of covered activities is listed below.[11]

- O&M
    - Operation activities include inspecting, monitoring, testing, and operating valves, enclosures, switches, and other components. These covered activities involve utility personnel working at facilities; personnel typically use existing access roads.
    - Maintenance activities include repairing and replacing facilities, structures, and access roads. This work includes reconductoring electric transmission and distribution projects and gas pipeline replacement. They also include emergency repair and replacement and vegetation management, including tree pruning and removal.

- Minor New Construction (total footprint expressed in acres)
    - Minor new construction, when in natural vegetation or agricultural lands that contain suitable habitat for covered species, is limited to two miles or fewer of new electric or gas line extensions from an existing line, a total of one acre or less of new gas pressure limiting stations within the HCP study area, and 0.5 acre or less per electric substation expansion.
    - Minor substation expansion that is limited to up to three-acres of permanent vegetation loss per substation attributable to the substation footprint.
    - Underground transmission line construction in urban areas.

- Pipeline Safety Enhancement Program
    - Inspection, field testing, and potentially replacing of existing gas transmission pipelines.
        - Pipeline replacements are estimated to average between four to eight miles and are primarily in urban areas.

Based on the list of covered activities above, the Trimble Substation Expansion would not be covered by the Bay Area HCP or the O&M FEIR since it would construct a new switching station that would permanently impact approximately 10 acres of vegetation. However, the PG&E transmission and IT lines that will connect the Trimble Substation Expansion to the CADC would be covered. For a covered facility, the programmatic measures would be enforceable by the administering agencies of

[11] Pacific Gas and Electric Company. *Pacific Gas and Electric Company Bay Area Operations & Maintenance Habitat Conservation Plan*. September 2017. Pages 1-17 and 3-1 through 3-38.

the Bay Area HCP, O&M FEIR and the ITP. However, PG&E has committed to implement the programmatic measures as part of this Project Description of the Trimble Substation Expansion. Although the programmatic measures would not be enforceable by the administrators of the Bay Area HCP, O&M FEIR and the ITP, these measures would be enforceable by the CPUC. As described above PG&E when it seeks concurrence from the CPUC that it qualifies for an exemption from the Permit To Construct of General Order 131-E it includes in its Advice Letter a complete description of the facilities it will build. Failure to build the PG&E facilities as described, which include adherence to all of the programmatic measures described herein, would result in the CPUC enforcement which could include revocation of the exemption requiring PG&E to cease construction and file a Permit To Construct. The Permit To Construct process will require additional CEQA review before construction could commence. Cessation of construction activities is the same enforcement mechanism applied to any applicant that fails to comply with a CEQA Mitigation Monitoring and Reporting Plan (MMRP) by a City.

The applicable PG&E programmatic measures identified in this SPPE Application are described in more detail below.

PG&E's Bay Area Habitat Conservation Plan

PG&E's Bay Area HCP provides a comprehensive framework for conserving sensitive habitats for preserving protected species. It is a 30-year permit issued by the USFWS to allow PG&E to comply with the federal Endangered Species Act more efficiently. The Bay Area HCP covers the nine counties that surround the San Francisco Bay, including Alameda, Santa Clara, San Mateo, San Francisco, Contra Costa, Marina, Sonoma, Napa, and Solano. Within these counties, the plan areas include PG&E gas and electric transmission and distribution facilities, rights-of-way (including standard buffers), lands owned by PG&E and/or subject to PG&E easements, access routes, and mitigation areas acquired to mitigate impacts resulting from covered activities.

The Bay Area HCP protects 18 wildlife species and 13 plant species and the habitats where they are found for 33 routine O&M activities. The HCP includes a number of avoidance and minimization measures (AMMs) to reduce impacts on sensitive habitats and covered species during performance of covered activities. Furthermore, PG&E has identified "hot zones" where certain covered species are known to occur and where AMMs specific to those species are implemented.

PG&E Avoidance Minimization Measures and Best Management Practices

The Bay Area HCP AMMs and BMPs are part of PG&E's project construction and design process and are referred to as PG&E Programmatic Measures instead of mitigation measures in this SPPE Application. Applicable AMMs and BMPs from the Bay Area HCP are listed in Table 3.7-1.

Table 3.7-1: Applicable Bay Area Habitat Conservation Plan Avoidance and Minimization Measures and Best Management Practices for Project Activities

HCP Code[1]	Description of Measure
FP-01	Hold annual training on habitat conservation plan requirements for employees and contractors performing covered activities in the Plan Area that are applicable to their job duties and work.
FP-02	Park vehicles and equipment on pavement, existing roads, or other disturbed or designated areas (barren, gravel, compacted dirt).
FP-03	Use existing access and ROW roads. Minimize the development of new access and ROW roads, including clearing and blading for temporary vehicle access in areas of natural vegetation.
FP-04	Locate off-road access routes and work sites to minimize impacts on plants, shrubs, and trees, small mammal burrows, and unique natural features (e.g., rock outcrops).
FP-07	Vehicle speeds on unpaved roads will not exceed 15 miles per hour.
FP-08	Prohibit trash dumping, firearms, open fires (such as barbecues), hunting, and pets (except for safety in remote locations) at work sites.
FP-11	Utilize standard erosion and sediment control BMPs (pursuant to the most current version of PG&E's Stormwater Field Manual for Construction Best Management Practices) to prevent construction site runoff into waterways.
FP-12	Stockpile soil within established work area boundaries and locate stockpiles so as not to enter water bodies, stormwater inlets, or other standing bodies of water. Cover stockpiled soil prior to precipitation events.
FP-15	Prohibit vehicular and equipment refueling 250 feet from the edge of vernal pools, and 100 feet from the edge of other wetlands, streams, or waterways. If refueling must be conducted closer to wetlands, construct a secondary containment area subject to review by an environmental field specialist and/or biologist. Maintain spill prevention and cleanup equipment in refueling areas.
FP-16	Maintain a buffer of 250 feet from the edge of vernal pools and 50 feet from the edge of wetlands, ponds, or riparian areas. If maintaining the buffer is not possible because the areas are either in or adjacent to facilities, the field crew will implement other measures as prescribed by the land planner, biologist, or HCP administrator to minimize impacts by flagging access, requiring foot access, restricting work until dry season, or requiring a biological monitor during the activity.
FP-17	Directionally fell trees away from an exclusion zone, if an exclusion zone has been defined. If this is not possible, remove the tree in sections. Avoid damage to adjacent trees to the extent possible. Avoid removal of snags and conifers with basal hollows, crown deformities, and/or limbs over 6 inches in diameter.
FP-18	Nests with eggs and/or chicks will be avoided: contact a biologist, land planner or the Avian Protection Program manager for further guidance.
Wetland-2	Identify wetlands, ponds, and riparian areas and establish buffers. Maintain a buffer of 50 feet around wetlands, ponds, and riparian areas. If maintaining the buffer is not possible because the areas are either in or adjacent to facilities, the field crew will implement other measures as prescribed by the biologist or HCP administrator to minimize impacts. These measures include flagging access, requiring foot access, restricting work until the dry season, requiring a biological monitor during the activity, or excavating burrows in ROWs where trenching will occur. Activities

HCP Code[1]	Description of Measure
	must maintain the downstream hydrology to the wetland, pond, or riparian area. Additional minimization measures may be implemented with prior concurrence from USFWS.
BMP 12	After vegetation management activities, if the amount of bare soil exposed in one location exceeds 0.1 acre, then erosion control measures shall be implemented. These measures may include straw mulching, seeding, and use of straw waddles. (No rice straw will be used around wetlands containing vernal pools.)
BMP 16	All PG&E employees and contractors shall follow the Vegetation Management Migratory Bird Process, when applicable to vegetation management activities, to comply with Migratory Bird Treaty Act.
BMP 23	If an environmental protection incident occurs, such as accidental introduction of substances into waterways or wetlands, accidental taking of an endangered species, or hazardous material spills, etc., call your supervisor and the PG&E vegetation management representative immediately.
BMP 25	The disturbance or removal of vegetation within the work area shall not exceed the minimum necessary to complete operations, subject to other public and health and safety directives governing the safe operations and maintenance of electric and gas facilities. Precautions shall be taken to avoid damage to non-target vegetation.
BMP 26	Cleared or pruned vegetation, grass clippings and woody debris (including chips) shall be disposed of in a legal manner. All cleared vegetation and debris, grass clippings and woody debris (including chips) shall be removed from any wetland, ditch, pond, or stream and placed or secured where they cannot re-enter the watercourse.
BMP 27	Vegetation that at mature height does not pose a threat to the conductors shall not be removed, unless the removal is required to maintain compliance with California Public Resource Code Section 4292 (pole clearing).
BMP 28	Any vehicles driven and/or operated within or adjacent to streams shall be checked and maintained daily to prevent leaks of materials that, if introduced to the water, could be harmful to aquatic life.
BMP 29	Vehicle access to streams and wetlands shall be limited to existing roads and crossings.
BMP 30	When possible, activities near streams, wetlands, or on saturated soils shall be conducted during the dry season (generally May 15–October 15) or during periods of minimum flow. If it is not possible to perform the work in the dry season, perform rainy season work during dry spells between rain events.
BMP 52	Sensitive habitats such as meadows, riparian areas, wetlands, vernal pools, and serpentine outcrops shall be flagged and appropriate avoidance measures shall be put in place. Tailboards shall be held before work begins.
BMP 62	The following protection measures are designed to prevent adverse impacts on water quality, help protect soil resources, and minimize the loss of riparian vegetation. Plants in watercourse protection zones that do not pose an imminent or clearly foreseeable future threat to conductors shall not be removed. To help prevent erosion and soil displacement, exclusion zones may be increased in areas with steep slopes or highly erodible soils.

HCP Code[1]	Description of Measure
	Leave at least 50% soil cover (i.e., mulch or vegetative ground cover) for erosion control in watercourse protection zones.
BMP 16	All PG&E employees and contractors shall follow the Vegetation Management Migratory Bird Process, when applicable to vegetation management activities, to comply with Migratory Bird Treaty Act.
BMP 23	If an environmental protection incident occurs, such as accidental introduction of substances into waterways or wetlands, accidental taking of an endangered species, or hazardous material spills, etc., call your supervisor and the PG&E vegetation management representative immediately.
BMP 25	The disturbance or removal of vegetation within the work area shall not exceed the minimum necessary to complete operations, subject to other public and health and safety directives governing the safe operations and maintenance of electric and gas facilities. Precautions shall be taken to avoid damage to non-target vegetation.
BMP 26	Cleared or pruned vegetation, grass clippings and woody debris (including chips) shall be disposed of in a legal manner. All cleared vegetation and debris, grass clippings and woody debris (including chips) shall be removed from any wetland, ditch, pond, or stream and placed or secured where they cannot re-enter the watercourse.
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BMP 52	Sensitive habitats such as meadows, riparian areas, wetlands, vernal pools, and serpentine outcrops shall be flagged and appropriate avoidance measures shall be put in place. Tailboards shall be held before work begins.
BMP 62	The following protection measures are designed to prevent adverse impacts on water quality, help protect soil resources, and minimize the loss of riparian vegetation. • Plants in watercourse protection zones that do not pose an imminent or clearly foreseeable future threat to conductors shall not be removed. • To help prevent erosion and soil displacement, exclusion zones may be increased in areas with steep slopes or highly erodible soils. • Leave at least 50% soil cover (i.e., mulch or vegetative ground cover) for erosion control in watercourse protection zones.

[1]FP = Field Protocol

In addition, for activities covered by the Bay Area HCP that impact more than 0.1 acres, PG&E will restore temporarily impacted habitat within 12 months of the completion of construction. Site restoration could include soil compaction, recontouring excavated areas to follow natural contours, reseeding areas cleared of plant cover, and planting trees or other vegetation.

PG&E Avian Protection Plan

To avoid and minimize impacts to nesting birds, PG&E has developed an Avian Protection Plan (APP).[12] The APP is implemented by PG&E biologists and other staff working on electric transmission and distribution facilities, as well as other PG&E activities near active bird nests (defined as nests containing eggs or young). PG&E is required to comply with federal and state laws and regulations that prohibit take of birds, including eggs or young, in active nests. Implementation of the APP includes the following:

- Utilizing avian-safe configurations for construction of new electric power facilities (i.e., poles), including framing for raptor protection (by increased separation of energized components), to the extent feasible.
- Utilizing insulation or other bird protection materials on exposed equipment leads during equipment repairs or pole retrofits.
- Providing a step-wise approach for reducing impacts on nesting birds that includes:
    - Desktop review of activities by a biologist to determine the potential to impact nesting birds.
    - If, during nesting season, there is potential for an activity to impact nesting birds, pre-construction nesting bird surveys are performed.
    - When nesting birds are identified during surveys, nest buffers are assigned for the activity, depending upon species, nest phase, work activity duration, and other environmental factors (e.g., presence of visual screening).
    - For certain species (threatened, endangered, or state fully protected), PG&E will confer with USFWS and/or CDFW when a standard buffer cannot be observed for a nesting species and covered activities cannot be reasonably modified.

The APP formalizes ongoing training requirements for utility employees. Training includes introduction to federal and state laws that protect birds; facility design to reduce avian interactions; information on identification of active bird nests; and reporting requirements pertinent to PG&E's Special Purpose Utility Permit, issued by the USFWS.

PG&E will also follow the process and procedures outlined in PG&E's APP and Nesting Bird Management Plan (discussed below) to protect nesting birds during vegetation removal work,

[12] California Department of Fish and Wildlife. *PG&E Bay Area O&M Incidental Take Permit Environmental Impact Report Volume 2. Final EIR.* June 2022. Pages 3.4-91 through 3.4-92.

which include pre-activity surveys and measures to protect active nests (e.g., rescheduling the work or maintaining a buffer around the active nest).

PG&E Nesting Bird Management Plan

To avoid impacts to nesting birds and maintain compliance with the Migratory Bird Treaty Act and state statute, PG&E has developed a comprehensive plan to avoid and minimize impacts on nesting birds. This management plan is implemented when PG&E activities are near active bird nests, which are defined as an active nest containing eggs or young. PG&E's Nesting Bird Management Plan is intended to do the following[13]:

- Maintain compliance with applicable federal and state bird protection regulations.
- Avoid and minimize disturbance to nesting birds within PG&E's service area.
- Standardize PG&E's approach to managing nesting bird conflicts using accepted wildlife management practices.

Implementation of the Nesting Bird Management Plan allows for consistent application of avoidance and minimization measures for nesting birds across PG&E activities, provides structured and standardized decision making, and allows PG&E to comply with federal and state regulations applicable to nesting birds. A step-wise compliance approach guides implementation of the Nesting Bird Management Plan is as follows:

- **Step 1: Conduct desktop review** as part of the environmental review and planning process prior to initiating activities in locations that provide suitable habitat for nesting birds. A qualified biologist determines if there is potential for the activity to impact nesting birds.
- **Step 2: Conduct preconstruction nesting bird surveys,** if there is potential to impact active nests in or near construction areas. Pre-construction surveys can detect recent or established nests and identify the need to implement or adjust standard exclusion buffers.
- **Step 3: Assign nest exclusion buffers** or other applicable AMMs around active nests. These nest exclusion buffers are species-specific, may be standard or reduced and may include periodic nest monitoring.
- **Step 4: Confer** with the USFWS and/or CDFW, as necessary. PG&E may confer with USFWS and/or CDFW when the standard buffer cannot be observed for a nesting threatened, endangered or fully protected species.

Bay Area Operations and Maintenance Incidental Take Permit Final Environmental Impact Report

The Bay Area Operations & Maintenance Incidental Take Permit (ITP) FEIR (O&M FEIR) for CDFW's 2022 PG&E Bay Area ITP (#2081-2015-031-03) covers PG&E's Bay Area operations and maintenance and minor new construction activities, and establishes a comprehensive approach to avoid,

[13] Ibid. Appendix C. Page 2-5.

minimize, and fully mitigate impacts on species and habitat, including common and special-status species that are not covered under the Bay Area HCP. The ITP provides incidental take coverage for the covered activities to the extent that they could result in impacts to three species, the California tiger salamander, Alameda whipsnake, and California freshwater shrimp (covered species). Applicable measures from the Bay Area O&M FEIR that are identified in this SPPE Application are provided in Table 3.7-2 below.[14]

Table 3.7-2: Applicant[15] Proposed Measures from the PG&E Operations & Maintenance Incidental Take Permit FEIR for Biological Resource Impacts

PG&E Programmatic Measures	Description of Measure
AIR-1: Implement Dust Control Best Management Practices	PG&E will implement control measures to reduce construction-related fugitive dust. The following measures are based on BAAQMD's CEQA guidelines and are in conformance with fugitive dust control recommendations from the NSCAPCD and YSAQMD. • All exposed surfaces will be watered at a frequency adequate to maintain minimum soil moisture of 12%. Moisture content can be verified by lab samples or moisture probe. • All haul trucks transporting soil, sand, or other loose material off site will be covered. • All visible mud or dirt track-out onto adjacent public roads will be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads will be limited to 15 miles per hour (mph). • All roadways, driveways, and sidewalks to be paved will be completed as soon as possible. Building pads will be laid as soon as possible after grading unless seeding or soil binders are used. • All excavation, grading, and/or demolition activities will be suspended when average wind speeds exceed 20 mph. • Wind breaks (e.g., trees, fences) will be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50% air porosity. • Vegetative ground cover (e.g., fast-germinating native grass seed) will be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. • The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time will be limited. Activities will be phased to reduce the amount of disturbed surfaces at any one time. • All trucks and equipment, including their tires, will be washed off prior to leaving the site.

[14] California Department of Fish and Wildlife. *PG&E Bay Area O&M Incidental Take Permit Environmental Impact Report Volume 2. Final EIR.* June 2022

[15] PG&E is the Applicant.

PG&E Programmatic Measures	Description of Measure
	• Site accesses to a distance of 100 feet from the paved road will be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel. • Sandbags or other erosion control measures will be installed to prevent silt runoff to public roadways from sites with a slope greater than 1%.
BIO-1: Prevent or minimize spread of invasive weeds	The following will be implemented on E9a (Reconductoring), G9 (Pipeline Lowering), G11 (Pipeline Replacement), and minor new construction to prevent the spread of invasive weeds during all phases of covered activities, as appropriate: • During covered activities involving ground disturbance, mud and/or accumulated soils will be removed from equipment and vehicles, to the extent feasible. Vehicles and equipment will be cleaned or washed before entering a new work site. A log will be kept for each job site and would be completed to document each cleaning or washing of vehicles or equipment before entering each new work site. • Vehicles will be staged and stored on paved or cleared areas whenever feasible. • Certified weed-free mulch, straw, hay bales, or equivalent materials will be used where necessary for covered activities.
BIO-2: Protect special-status wildlife encountered while performing covered activities and report covered wildlife observations	Any special-status wildlife species encountered during the course of a covered activity will be allowed to leave the area unharmed, and work activities that could disturb or harm the individual will halt until the wildlife has left the area. Encounters with a special-status species will be reported to a qualified biologist and PG&E environmental staff. PG&E will maintain records of all covered wildlife species encountered during permitted activities. Encounters with covered wildlife species will be documented and provided to CDFW in an annual report as required by the ITP. If a covered wildlife species is encountered during the course of operations, the following information will be reported for each species: • The locations (i.e., narrative, vegetation type, and maps) and dates of observations, including occurrences observed during any required surveys. • The general condition of individual health (e.g., apparent injuries). • If the species is moved, the location where the species was captured and the location where it was released. • The locations, dates, and species and behaviors observed during covered wildlife monitoring. When conducting covered activities E9a (Reconductoring), G9 (Pipeline Lowering), G11 (Pipeline Replacement), and minor new construction PG&E will document encounters with special status species to the same level of detail as required for covered species. During PG&E's environmental screening process, PG&E will also apply this measure to other covered

PG&E Programmatic Measures	Description of Measure
	activities to protect special status species and habitats based on recommendations from qualified biologists. This data will be provided in ITP annual reports.
BIO-3: Design and site minor new construction activities to avoid sensitive areas	New, permanent facilities as part of minor new construction activities will be sited and designed to avoid impacts on sensitive vegetation types, sensitive natural communities, and unique plant assemblages, as well as occupied habitat and suitable habitat for special-status species, to the extent feasible. If impacts on these areas cannot be avoided, PG&E will determine if additional permitting is required to conduct the work and obtain the required permits (e.g., LSAA). If impacts are expected on covered species' habitat, Mitigation Measure BIO-1 (MM BIO-1) will be implemented to mitigate for habitat impacts. Where minor new construction would result in impacts on sensitive vegetation types, sensitive natural communities, or unique plant assemblages, PG&E will minimize the construction footprint and implement appropriate protective measures as recommended by the qualified biologist to protect the natural community. Examples of such measures include: reseeding with a California annual seed mix, installing protective fencing around sensitive natural communities or resources, and installing wattles, erosion blankets and other drainage controls to protect new or adjacent plantings.
BIO-3a: Minimize spread of invasive plant and plant pathogens in minor new construction	When conducting minor new construction activities, PG&E will avoid or minimize the spread of invasive species by taking the following actions: • Prior to commencement of activities located on or adjacent to non-paved surfaces, a qualified biologist will flag known populations of noxious weeds and invasive plants in the work areas. Invasive plant species include those listed as invasive by the California Invasive Plant Council (Cal IPC). • PG&E will stage work in areas not infested with weeds or treat for weed removal prior to using an infested area. • Prior to ground disturbance in areas containing species susceptible to Sudden Oak Death, a qualified professional (e.g., biologist, arborist, botanist familiar with Sudden Oak Death and the vegetation communities in the area) will assess the risk of activities and will identify and implement measures to reduce or avoid the risk of Sudden Oak Death spread. These measures will include but will not be limited to the following, and will be further developed and updated based on the best available science and site-specific conditions: a. Designate quarantine areas and implement proper measures for disposal of infested materials (e.g., branches, split wood, wood chips), b. Sanitize shoes, pruning gear, and other equipment with sanitizing materials (e.g., chlorine bleach, Clorox Clean-up, Lysol, scrub brush, boot brush) before and after

PG&E Programmatic Measures	Description of Measure
	ground-disturbing and vegetation removal activities are implemented, • Clothing, footwear, and equipment used during minor new construction will be cleaned of soil, seeds, vegetation, or other debris or seed-bearing material before entering a work site or when leaving an area with infestations of invasive plants and noxious weeds. • Heavy equipment and other machinery used in areas with infestations of invasive plant species or Sudden Oak Death will be inspected for the presence of invasive species before use on the project site and will be cleaned before entering the site, to reduce the risk of introducing invasive plant species or plant pathogens. • To minimize the introduction and spread of noxious weeds and invasive plants, PG&E will avoid moving weed-infested gravel, rock, and other fill materials to relatively weed-free locations. In areas where invasive plants are removed during minor new construction or vegetation removal activities, PG&E will dispose of invasive plant biomass off site at an appropriate waste collection facility or treat biomass on site to eliminate seeds and propagules and prevent reestablishment; if moved off site, PG&E will transport invasive plant material in a closed container or bag to prevent the spread of propagules during transport. PG&E will use certified weed-free straw and mulch for erosion-control projects. PG&E will maintain stockpiled, uninfested material in a weed-free condition. • Areas where ground disturbance has resulted in exposed soil as a result of minor new construction shall be seeded with compatible California annual species, as determined by a qualified biologist or botanist familiar with the native vegetation in the area and experienced in revegetation techniques. Revegetation will occur prior to the onset of winter rains within the year initial impacts take place. If work cannot feasibly be scheduled outside the rainy season, revegetation may occur as directed by the qualified biologist and no later than the onset of the next winter rains. • To ensure a successful revegetation effort, on-site vegetation shall meet the following success criteria: a. PG&E shall perform pre-activity surveys to record baseline vegetative ground cover conditions and composition by a qualified biologist prior to covered activities as follows. The biologist will record the following: i. Absolute percent ground cover for the entire work area. ii. Relative percentages of ground cover within the work area by herbaceous plants, shrubs,

PG&E Programmatic Measures	Description of Measure
	trees, and noxious/invasive plants. iii. Develop a catalog of all invasive species present within the work area, including an estimate of percent composition by species. b. PG&E will conduct post-activity monitoring of work areas in the spring following completion of minor new construction. i. A qualified biologist will record any new invasive species that may have inadvertently been introduced to the work area. The biologist shall make special note of any new invasive plant species rated as "high" by the Cal IPC. ii. A qualified biologist will record whether there was an increase in relative cover of invasive species from baseline that may have resulted from the covered activity. iii. If relative cover of invasive plant species has increased within the work area, PG&E shall remove and/or dispose of invasive plants in an appropriate manner, as recommended by a qualified biologist and/or a Pest Control Advisor.5 If any new invasive plants rated by Cal IPC as "high" are found within the work area, they will be removed in an appropriate manner, as recommended by a qualified biologist and/or a Pest Control Advisor. iv. If the relative ground cover of invasive plants exceeds baseline by 100 percent or more, PG&E will reseed the areas where invasive plants are removed and monitor for one additional year.
BIO-6: Protect nesting birds	All vegetation clearing and ground-disturbing activities will be conducted outside of the nesting season (generally March 1–August 31) to the extent feasible. If this is not feasible, a biologist or qualified7 individual will determine if pre-construction activity surveys, nest buffers, and/or monitoring are needed in accordance with PG&E's Nesting Bird Management Plan. Nesting bird surveys will be scheduled to occur within a timeframe prior to construction the activity that is suitable for the detection of recently established nests. If active nests containing eggs or young are found, the qualified biologist or individual will establish an appropriate nest buffer in accordance with the species-specific buffers in PG&E's Nesting Bird Management Plan. Nest buffers under the Plan will be species-specific and can range from 15 to 100 feet for passerines, 50 to 300 feet for raptors, or larger if necessary, depending on the planned activity's level of disturbance,

PG&E Programmatic Measures	Description of Measure
	site conditions, and the observed bird behavior. Covered activities will not commence within the established buffer areas until the qualified biologist or individual determines that the young have fledged or the nest is no longer active. Active nests will be periodically monitored until the young have fledged or the activity all construction is finished. If birds with active nests are observed showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during covered activities, the buffer will be increased to a distance in which the behavioral signs of agitation cease, in accordance with PG&E's Nesting Bird Management Plan. As part of the ITP annual report, PG&E will provide a summary of covered activities where the Nesting Bird Management Plan was implemented; the summary will include the location, dates, species (if known), and nest buffers applied to the covered activity including buffer efficacy. (The Nesting Bird Management Plan is intended to maintain compliance with federal and state bird protection regulations through a standardized approach to avoiding and minimizing disturbance to nesting birds, including burrowing owl [see BIO-6a].)
BIO-6a: Western burrowing owl avoidance	If burrowing owls are observed during any covered activities, a qualified biologist will be contacted immediately. The qualified biologist will determine measures to avoid impacts burrowing owls. For ground disturbing activities greater than 0.1 acre in suitable burrowing owl habitat, a qualified biologist will conduct a survey at least 14 days prior and again 24 hours prior to the activity to determine the presence/absence of active burrowing owl nesting or wintering burrows within 250 feet of a work area. If owls or sign are detected and work needs to occur within 250 feet, PG&E will implement measures to avoid nest abandonment such as rescheduling the work, screening work areas, minimizing pedestrian access within 250 feet, and evaluating owl's tolerance to disturbance, and report results to CDFW annually.
BIO-7: Protect breeding and pupping bats	When feasible, activities directly affecting bat roosting habitat will be conducted outside of the bat breeding/pupping season (generally, April through mid-September). If work that would affect known bat breeding sites must be done in the bat breeding/pupping season, a qualified biologist would evaluate known breading/roosting sites or conduct surveys for bat roosts in suitable breeding/roosting sites (e.g., bridges, mines, caves, trees with hollows, palm trees, snags, buildings, long and dark culverts, rock outcrops, dense tree canopies, and flaking tree bark). If evidence of a bat maternity roost is found or maternity roosts are detected, PG&E will avoid conducting covered activities that may directly affect the active roost site, including the following: • If a maternity roost is identified then the qualified bat biologist will develop a Bat Avoidance and Monitoring Plan prior to the start of project activities that shall include: (1) an assessment of all impacts to bats from the activity, including noise disturbance during covered

PG&E Programmatic Measures	Description of Measure
	activities and (2) effective avoidance and minimization measures to protect bats in order to ensure that direct impact to active bat maternity roost site do not occur. Notification will be provided to CDFW prior to the start of covered activities. The notification will include a copy of the Bat Avoidance and Monitoring Plan. If direct impacts to identified maternity roost site cannot be avoided, PG&E will provide a compensatory mitigation plan to CDFW for review and approval. • As necessary, an exclusionary buffer will be maintained around active roosts. The size of the buffer will be determined by the qualified biologist based on factors such as the planned activity's level of disturbance and site conditions and will typically be 250 feet. • As necessary, a qualified biologist will monitor active roost site buffers during O&M activities to determine if roosting activity is influenced by noise or vibrations until a qualified biologist has determined if the young bats are volant (i.e., able to fly) or the roost is unoccupied. • When feasible, to protect bats and in accordance with BMP-30, tree work near riparian zones shall be conducted during the dry season (generally May 15–October 15). If it is not feasible to conduct tree work during the dry season, operations will occur between rain events or during dry spells unless there is an emergency or imminent threat to life or property.
CR-1: Inventory, evaluate, and protect cultural resources	As part of the screening process described in Chapter 2, Project Description, PG&E will continue to review historical and archaeological resources that were previously recorded, as well as structures that meet the 50-year threshold throughout the 30-year duration of ITP. If any resources have the potential to be eligible for listing on the CRHR or NRHP, PG&E will determine whether project activities will affect the resources and, if the activities would cause a substantial adverse change in the resource, a qualified cultural specialist will coordinate with PG&E, the landowner, and CDFW on the appropriate steps for evaluation, protection, documentation and/or preservation of the resource.
CR-2 Provide worker training	The following procedures will be implemented prior to commencement of any project-related construction activities: All PG&E, contractor, and subcontractor project personnel will receive training regarding: • Appropriate work practices necessary to effectively implement the Applicant Proposed Measures (APMs) and to comply with the applicable environmental laws and regulations. • The potential for exposing subsurface cultural resources and paleontological resources. • How to recognize possible buried cultural and paleontological resources.

PG&E Programmatic Measures	Description of Measure
	• Site-specific physical conditions to improve hazard prevention and, if applicable, a review of the stormwater pollution prevention plan, which will also address spill response. • Contact information for the project (i.e., environmental planner who will reach out to the appropriate resource specialist, such as archaeologists, paleontologists, cultural monitors, or tribal monitors, as needed). This training will include a presentation of: • Procedures to be followed upon discovery or suspected discovery of historic or archaeological materials, including Native American remains and their treatment. • Procedures to be followed upon discovery or suspected discovery of paleontological resources. • Procedures to be followed for spill and other hazard prevention. Actions that may be taken in the case of violation of applicable laws.
CR-3: Inadvertent discovery of previously unidentified cultural resources	The following procedure will be employed if a previously undocumented cultural resource is encountered during construction: • All work within 100 feet (30 meters) of the find will be halted or redirected by the construction foreman and protective barriers or flagging will be installed along with signage identifying the area as an "environmentally sensitive area." Entry into the area will be limited to PG&E-approved/qualified CRSs, PG&E, and other authorized personnel. • PG&E and the CPUC will be notified immediately. • A qualified archaeologist will document the resource and coordinate with PG&E, the landowner, and the CPUC on the appropriate steps for evaluation and preservation of the find. The level of effort will be based on the size and nature of the resource, as determined by the archeologist and approved by the CPUC. No work will occur within the environmentally sensitive area until clearance has been granted by the archaeologist or PG&E and the CPUC. Environmentally sensitive area flagging and signage will only be removed when authorized by PG&E or the archaeologist and the CPUC.
CR-4: Discovery of human remains	The following procedures will be implemented in the event of the discovery of human remains, in compliance with California law, including, but not limited to, the following provisions: CEQA Guidelines Section 15064.5(e); Public Resources Code Sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code Section 7050.5: Work in the immediate area within 100 feet of the find will be halted and the PG&E archaeologist, County Coroner, and CPUC will be notified immediately. Work will remain suspended until the Coroner can assess the remains. In the event the remains are determined to be precontact in origin, the Coroner will notify the NAHC within 24 hours, which will then identify an MLD. The MLD will consult with PG&E's archaeologist within 48 hours of notification to determine further treatment of the remains.
CR-5: Undiscovered potential tribal cultural resources	The following procedure will be employed (after stopping work and following the procedure for determining eligibility in APM CUL-2) if a resource is encountered and determined by the project's qualified

PG&E Programmatic Measures	Description of Measure
	archaeologist to be potentially eligible for the CRHR or a local register of historic resources and is associated with a California Native American Tribe(s) with a traditional and cultural affiliation with the geographic area of the proposed project: • The project's qualified archaeologist will notify the CPUC for appropriate action. PG&E will assist the CPUC if needed to identify the lead contact person for the California Native American Tribe(s) potentially associated with the cultural resource and with a traditional and cultural affiliation with the geographic area of the proposed project. The CPUC will contact the lead contact person to set up a meeting with PG&E and the CPUC. • The project's qualified archaeologist will participate with the CPUC in discussions with the California Native American Tribe(s) to determine whether the resource is a TCR as defined by Public Resources Code Section 21074, and the tribe(s)' preferred method of mitigation, if the resource is determined to be a TCR. If no agreement can be reached for mitigation after discussions with the California Native American Tribe(s) or it is determined that the tribe(s)' preferred mitigation is not feasible, PG&E will consult with the CPUC and implement one of the example mitigation measures listed in Public Resources Code Section 21084.3(b), or other feasible mitigation.
GEO-1: Protect unanticipated paleontological resource discoveries	If potential paleontological resources are discovered during construction activities, work will stop within 100 feet and the project paleontologist, who meets the minimum qualification standards established by the Society for Vertebrate Paleontology, will be contacted immediately. If the discovery is determined to be significant, PG&E will implement measures to protect and document the paleontological resource, as directed by the paleontologist in consultation with the landowner, PG&E, and California Department of Fish and Wildlife. Efforts will be made to retain and protect such resources in place. If recovery of those resources is required to prevent their destruction, the paleontologist will develop a recovery strategy at a level appropriate to the discovery and in accordance with industry practice. The paleontologist will supervise the recovery effort, which may include the following components as appropriate to reduce impacts to a less-than-significant level: establishing recovery standards, preparing specimens for identification and preservation, documentation and reporting, and securing a curation agreement from the approved agency. Work may not resume within 100 feet of the find until approval by the paleontologist.
GEO-2: Provide worker environmental awareness training	PG&E will provide environmental awareness training on paleontological resources protection when in areas with known or discovered resources. This training will include: types of paleontological resources that could occur at the project site; types of soils or lithologies in which the paleontological resources could be preserved; procedures that should be followed in the event paleontological resources are discovered; and penalties for disturbing paleontological resources.

PG&E Programmatic Measures	Description of Measure
HAZ-1: Spill Response	PG&E will implement its hazardous substance control and emergency response procedures as needed. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of construction through operation. They address worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on site. If it is necessary to store chemicals on site, they will be managed in accordance with all applicable regulations. Material safety data sheets shall be maintained and kept available on site, as applicable. In the event that soils suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during site grading activities or excavation activities, the excavated soil will be tested and, if contaminated above hazardous waste levels, will be contained and disposed of at a licensed waste facility. The presence of suspected contaminated soil will require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations. All hazardous materials and hazardous wastes shall be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following: • Proper disposal of potentially contaminated soils. • Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources. • Emergency response and reporting procedures to address hazardous material spills. • Stopping work and contacting the local fire department or other agencies as appropriate. Work will resume after any necessary consultation and approval by the local fire department. • Emergency-spill response and clean up kits will be on site where they are immediately available to respond to an accidental release of a hazardous fluid or material. If applicable, a Stormwater Pollution Prevention Plan (SWPPP) will be implemented, which will also address spill response and other site-specific physical conditions to improve hazard prevention.
NOI-1: Restrict construction hours	Planned construction activities within 900 feet of occupied residential parcels that require the use of off-road construction equipment will be consistent with local noise ordinance guidelines, which typically limit construction noise to daylight hours, or a similar restriction. Should work in

PG&E Programmatic Measures	Description of Measure
	these locations be required outside of these hours due to safety or clearance requirements, construction will be limited to the minimum necessary and will proceed as expediently as safely possible to reach a safe and convenient stopping point.
NOI-2: Limit noise during construction near occupied residences	PG&E will use "quiet" equipment (i.e., equipment designed with noise control elements), standard equipment fitted with noise control devices (e.g., mufflers), or other noise-reduction measures as feasible to limit construction noise to within local noise ordinance limits whenever feasible and within 250 feet of occupied residences.
FIRE-1: Construction Fire Prevention Practices	PG&E will implement the following fire prevention practices at active construction sites. • During Red Flag Warning events, as issued daily by the National Weather Service, all construction activities will cease, with an exception for transmission line testing, repairs, unfinished work, or other specific activities that may be allowed if the facility/equipment poses a greater fire risk if left in its current state. • All construction crews and inspectors will be provided with radio and cellular telephone access that is operational in all work areas and access routes to allow for immediate reporting of fires. Communication pathways and equipment will be tested and confirmed operational each day prior to initiating construction activities at each work site. All fires will be reported to the fire agencies with jurisdiction in the area immediately upon discovery of the ignition. • Construction personnel will be trained in fire-safe actions, initial attack firefighting, and fire reporting. Construction personnel will be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats. • All construction personnel will carry a laminated card and be provided a hard hat sticker that list pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on laminated contact cards and hard hat stickers will be updated as needed and redistributed to all construction personnel prior to the day the information change goes into effect. • Construction personnel will have fire suppression equipment on all construction vehicles and will be required to park vehicles away from dry vegetation. PG&E will coordinate with applicable local fire departments prior to construction activities to determine the appropriate amounts of fire equipment to be carried on vehicles and, should a fire occur, to coordinate fire suppression activities. • Water tanks and/or water trucks will be sited or available at active project sites for fire protection during construction.

Section 4.0 Environmental Setting, Impacts, and Mitigation

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

4.1	Aesthetics	4.11	Land Use and Planning
4.2	Agriculture and Forestry Resources	4.12	Mineral Resources
4.3	Air Quality	4.13	Noise
4.4	Biological Resources	4.14	Population and Housing
4.5	Cultural Resources	4.15	Public Services
4.6	Energy	4.16	Recreation
4.7	Geology and Soils	4.17	Transportation
4.8	Greenhouse Gas Emissions	4.18	Tribal Cultural Resources
4.9	Hazards and Hazardous Materials	4.19	Utilities and Service Systems
4.10	Hydrology and Water Quality	4.20	Wildfire
		4.21	Environmental Justice

The discussion for each environmental subject includes the following subsections:

Environmental Setting – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the Project and 2) describes the existing, physical environmental conditions at the Project Site and in the surrounding area, as relevant.

Impact Discussion – This subsection includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts.

- **Project Impacts** – This subsection discusses the Project's impact on the environmental subject as related to the checklist questions. For significant impacts, feasible "Project Design Measures" (PDMs) are identified. PDMs are measures that Prologis has proposed that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). PDMs are numbered to correspond to the impact they address. For example, PDM BIO-1.3 refers to the third measure for the first impact in the Biological Resources section. To reduce impacts related to the off-site PG&E infrastructure, PG&E programmatic measures are identified generally as "PG&E programmatic measures," or as "Applicant Proposed Measures (APM)" if derived directly from the PG&E Bay Area Operations and Maintenance Incidental Take Permit Final Environmental Impact Report. For example APM HAZ-1 refers to a specific APM to reduced hazardous impacts.

- **Cumulative Impacts** – This subsection discusses the Project's cumulative impact on the environmental subject. Cumulative impacts, as defined by CEQA, refer to two or more individual effects, which when combined, compound or increase other environmental impacts. Cumulative impacts may result from individually minor, but collectively significant effects taking place over a period of time. CEQA Guideline Section 15130 states that an environmental impact report (EIR) should discuss cumulative impacts "when the project's incremental effect is cumulatively considerable." The discussion does not need to be in as great detail as is necessary for project impacts but is to be "guided by the standards of practicality and reasonableness." The purpose of the cumulative analysis is to allow decision makers to better understand the impacts that might result from approval of past, present, and reasonably foreseeable future projects, in conjunction with the proposed Project addressed in this SPPE Application.

  The CEQA Guidelines advise that a discussion of cumulative impacts should reflect both their severity and the likelihood of their occurrence (CEQA Guidelines Section 15130(b)). To accomplish these two objectives, the analysis should include either a list of past, present, and probable future projects or a summary of projections from an adopted general plan or similar document (CEQA Guidelines Section 15130(b)(1)).

  The analysis must determine whether the Project's contribution to any cumulatively significant impact is cumulatively considerable, as defined by CEQA Guideline Section 15065(a)(3). The cumulative impacts discussion for each environmental issue accordingly addresses the following issues: 1) would the effects of all of past, present, and probable future (pending) development result in a significant cumulative impact on the resource in question; and, if that cumulative impact is likely to be significant, 2) would the contribution from the proposed project to that significant cumulative impact be cumulatively considerable?

  For each resource area, cumulative impacts may occur over different geographic areas. For example, the project effects on air quality would combine with the effects of projects in the entire air basin, whereas noise impacts would primarily be localized to the surrounding area. The geographic area that could be affected by the proposed project varies depending upon the type of environmental issue being considered. Section 15130(b)(3) of the CEQA Guidelines states that lead agencies should define the geographic scope of the area affected by the cumulative effect. Table 4.0-1 provides a summary of the different geographic areas used to evaluate cumulative impacts.

Table 4.0-1: Geographic Considerations in Cumulative Analysis

Resource Area	Geographic Area
Aesthetics	Project Site and adjacent parcels
Agriculture and Forestry Resources	Countywide
Air Quality	San Francisco Bay Area Air Basin
Biological Resources	Project Site and adjacent parcels
Cultural Resources	Project Site and adjacent parcels
Energy	Energy provider's territory
Geology and Soils	Project Site and adjacent parcels
GHGs	Planet-wide
Hazards and Hazardous Materials	Project Site and adjacent parcels
Hydrology and Water Quality	Guadalupe River watershed
Land Use and Planning/Population and Housing	Citywide
Minerals	Identified mineral recovery or resource area
Noise and Vibration	Project Site and adjacent parcels
Public Services and Recreation	Citywide
Transportation/Traffic	Citywide
Tribal Cultural Resources	Project Site and adjacent parcels
Utilities and Service Systems	Citywide
Wildfire	Within or adjacent to the wildfire hazard zone

4.1 Aesthetics

4.1.1 Environmental Setting

4.1.1.1 *Regulatory Framework*

State

Streets and Highway Code Sections 260 through 263

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. There are no state-designated scenic highways in San José. Interstate 280 (I-280) from the San Mateo County line to State Route (SR) 17, which includes segments in San José is an eligible, but not officially designated, State Scenic Highway.[16] In Santa Clara County, the one state-designated scenic highway is SR 9 from the Santa Cruz County line to the Los Gatos City Limit.

Local

Envision San José 2040 General Plan

The Envision San José 2040 General Plan (General Plan) includes the following policies that are specific to aesthetic resources and relevant to this analysis:

Policy	Description
CD-1.1	Require the highest standards of architecture and site design, and apply strong design controls for all development projects, both public and private, for the enhancement and development of community character and for the proper transition between areas with different types of land uses.
CD-1.12	Use building design to reflect both the unique character of a specific site and the context of surrounding development and to support pedestrian movement throughout the building site by providing convenient means of entry from public streets and transit facilities where applicable, and by designing ground level building frontages to create an attractive pedestrian environment along building frontages. Unless it is appropriate to the site and context, franchise-style architecture is strongly discouraged.
CD-1.13	Use design review to encourage creative, high-quality, innovative, and distinctive architecture that helps to create unique, vibrant places that are both desirable urban places to live, work, and play and that lead to competitive advantages over other regions.

[16] California Department of Transportation. "Scenic Highways." Accessed February 25, 2026. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

Policy	Description
CD-1.17	Minimize the footprint and visibility of parking areas. Where parking areas are necessary, provide aesthetically pleasing and visually interesting parking garages with clearly identified pedestrian entrances and walkways. Encourage designs that encapsulate parking facilities behind active building space or screen parked vehicles from view from the public realm. Ensure that garage lighting does not impact adjacent uses, and to the extent feasible, avoid impacts of headlights on adjacent land uses.
CD-1.23	Further the Community Forest Goals and Policies in this Plan by requiring new development to plant and maintain trees at appropriate locations on private property and along public street frontages. Use trees to help soften the appearance of the built environment, help provide transitions between land uses, and shade pedestrian and bicycle areas.
CD-10.2	Require that new public and private development adjacent to Gateways and freeways (including 101, 880, 680, 280, 17, 85, 237, and 87), and Grand Boulevards consist of high-quality materials, and contribute to a positive image of San José.
CD-10.3	Require that development visible from freeways (including 101, 880, 680, 280, 17, 85, 237, and 87) is designed to preserve and enhance attractive natural and man-made vistas.

City Design Guidelines and Design Review Process

Nearly all new private development is subject to a design review process (e.g., architecture and site planning). The design review process is used to evaluate projects for consistency with adopted design guidelines to assist those involved with the design, construction, review and approval of development in San José. Adopted design guidelines include Residential, Industrial, Commercial, Downtown/Historic, and Downtown Design Guidelines.

City Council Private Outdoor Lighting Policy 4-3

On March 1, 1983, the City of San José implemented the Outdoor Lighting on Private Development policy. The purpose of the policy is to promote energy-efficient outdoor lighting on private development in the City of San José that provides adequate light for nighttime activities, while benefiting from the continued enjoyment of the night sky and continuing operation of the Lick Observatory by reducing light pollution and sky glow.

4.1.1.2 *Existing Conditions*

CABGF/CADC Site

The 12.88-acre CABGF/CADC Site is currently developed with five, one-story light industrial and warehouse buildings, surface parking lots, and ornamental landscaping. The light industrial and warehouse buildings are rectangular in shape and have concrete exterior siding.

Trimble Substation Expansion Site

The approximately 10-acre Trimble Substation Expansion Site is located roughly 0.5-mile west of the CABGF/CADC Site at the southwest corner of the Component Drive/N. First Street intersection. The Trimble Substation Expansion Site is currently undeveloped and covered in grasses and shrubs.

PG&E Transmission Line Routes

The PG&E transmission line routes would be located within the public right-of-way along Zanker Road, Charcot Avenue, Component Drive, N. First Street, and E. Brokaw Road.

Surrounding Uses

The area surrounding the Project Component Sites is generally characterized by contemporary commercial, office, and light industrial buildings ranging from one to four stories in height (see Figure 2.5-3).

Scenic Views

The General Plan defines scenic vistas or resources in the City as broad views of the Santa Clara Valley, the hills and mountains surrounding the valley, the urban skyline, and the baylands.[17] Panoramic views of hillside areas, including the foothills of the Diablo Range, Silver Creek Hills, Santa Teresa Hills, and foothills of the Santa Cruz Mountains, are identified as key scenic features in the City (as shown on Figure 4.1-1). The Project Component Sites and vicinity have minimal to no scenic views of the Diablo foothills to the east, and Santa Teresa Hills and Silver Creek Hills to the south. The Trimble Substation Expansion Site offers views of the Santa Cruz Mountains to the southwest. No natural scenic resources, such as rock outcroppings, are present on-site or in the vicinity of the Project Component Sites and the off-site multi-modal improvements.

Scenic Corridors

The City's General Plan identifies Gateways and Urban Throughways (urban corridors) where preservation and enhancement of views of the natural and man-made environment are crucial.[18] The closest Urban Throughway to the Project Component Sites is US 101, located approximately 0.5-mile to the southwest; however, the Project Component Sites are not visible from US 101. The Trimble Substation Expansion Site and part of the transmission line routes are located within a designated Gateway at the intersection of Charcot Avenue and N. First Street (see Figure 4.1-1). The CABGF/CADC Site, however, is not located within a designated Gateway.

[17] City of San José. *Integrated Final Program Environmental Impact Report for the Envision San José 2040 General Plan.* SCH# 2009072096. September 2011. Page 739.
[18] Ibid. Page 717.

There are no state-designated scenic highways in San José. The nearest officially designated state scenic highway to the CBGF/CDC is SR 9, located more than 10 miles southwest of the Project Component Sites.[19]

Light and Glare

The Project Component Sites are located in a developed and urbanized area of the City. The main sources of light in the vicinity of the Sites are typical of developed urban areas, including headlights, streetlights, parking lot lights, security lights, and reflective surfaces such as windows.

[19] California Department of Transportation. "Scenic Highways." Accessed March 5, 2026. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

4.1.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?[20] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
Would the project result in a cumulatively considerable contribution to a significant cumulative aesthetics impact?	☐	☐	☒	☐

4.1.2.1 *Project Impacts*

a) Would the project have a substantial adverse effect on a scenic vista?

CABGF/CADC Site

The proposed Project will construct a new data center building with a height of approximately 82 feet to the top of the parapet and 95 feet to the top of the elevator penthouse. The area around the CABGF/CADC Site provides minimal to no views of the Diablo foothills.

The proposed data center building would be taller than the surrounding buildings; however, views of the Diablo foothills around the CABGF/CADC site from public vantage points are already limited or nonexistent due to intervening existing buildings and trees. Thus, the proposed CABGF/CADC would not diminish scenic views or damage any scenic resources in the project area and, therefore, implementation of the project would not result in a significant impact on a scenic vista. **(Less than Significant Impact)**

[20] Public views are those that are experienced from publicly accessible vantage points.

Trimble Substation Expansion Site

The gas-insulated switchgear (GIS) enclosures and supporting electric infrastructure in the proposed Trimble Switching Site will reach a maximum height of approximately 50 feet. A 10- to 20-foot-high security wall with a guard topper will surround the switchyard. The Trimble Substation Expansion will loop in and extend the existing Los Esteros–Trimble 115 kV and Montague–Trimble 115 kV double circuit power line into the facility via two new TSPs with a maximum height of approximately 90 to 100 feet. The TSPs will have the same general aesthetic characteristics of the existing TSPs along Component Drive.

The Trimble Substation Expansion Site currently affords views of the Santa Cruz Mountains from public vantage points surrounding the site. The proposed electrical infrastructure gear would have a maximum height of 50 feet and the TSPs would reach a height of 100 feet. These proposed heights could partially block views of the Santa Cruz Mountains from public viewpoints along N. First Street. However, the proposed heights of these components are consistent with existing electrical infrastructure in the area, as well as adjacent industrial development and zoning requirements. Views of the Santa Cruz Mountains would still be available from public viewpoints along N. First Street and Component Drive. As a result, the proposed Trimble Substation Expansion would not have a substantial adverse effect on a scenic vista. **(Less than Significant Impact)**

PG&E Transmission Line Routes

In order to connect the CADC to the proposed Trimble Substation Expansion, PG&E will construct a new transmission line in one of three potential routes, as described in Section 3.5.4. The transmission line will be either underground or overhead and will be located in the public right-of-way along Zanker Road, Charcot Avenue, Component Drive, N. First Street, and/or E. Brokaw Road. If the transmission lines will be overhead, they will be supported by wood poles, LDSPs, or TSPs ranging in height from 70-120 feet. The installation of electric utility poles in the public right of way in an urbanized area would not represent a substantial adverse effect on a scenic vista. **(Less than Significant Impact)**

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The Project Component Sites are not located along a state scenic highway. The nearest state scenic highway is SR 9, located approximately 10 miles southwest of the Project Component Sites. No scenic resources such as heritage trees, rock outcroppings, or historic buildings are present on the

Sites.[21,22] Therefore, the proposed Project would not significantly impact scenic resources. **(Less than Significant Impact)**

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Urbanized Area

The Project Component Sites are within an urbanized area in San José. The General Plan EIR concluded that new development and redevelopment allowed under the General Plan would alter the appearance of San José, and implementation of applicable policies and regulations (including the City's various Design Guidelines) would avoid substantial degradation of the visual character of the City. As discussed in Section 4.11 Land Use and Planning, the Project would be consistent with the General Plan designation of IP since a data center use would be allowed under these land use designations. Furthermore, the floor area ratio of 0.9 would not exceed the IP floor area ratio of 10.0.

As discussed in Section 4.4 Biological Resources, construction of the CABGF/CADC will include the removal of 22 trees, including 19 ordinance size trees. All trees removed would be replaced in accordance with the City of San José Tree Protection Ordinance, San José Municipal Code Section 13.28, and General Plan Policies MS-21.4, MS-21.5, and MS-21.6. Therefore, the Project would not conflict with applicable zoning and other regulations governing the scenic quality of the City's community forest and urban canopy.

Although the City's Zoning Ordinance does not include regulations governing scenic quality, the proposed CABGF/CADC would be subject to design review conducted as part of the development permit review process to ensure that it conforms with all adopted design guidelines and other relevant policies and ordinances. Additionally, although the Trimble Substation Expansion would not be subject to the City's design review, it would adhere to PG&E's design standards and would be similar in nature to existing PG&E infrastructure in the project area, such as the Trimble Substation. For these reasons, the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality of the City. **(Less than Significant Impact)**

[21] City of San José. "Heritage Trees." Map. Accessed March 5, 2026. https://experience.arcgis.com/experience/98193189cb7443b8a8f1452961b6d935.
[22] City of San José. "Historic Resource Inventory." March 5, 2026. https://experience.arcgis.com/experience/4ef3418d9e58451c9c45086ac9a90d6e.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The CABGF/CADC will include new lighting for security purposes (including outdoor lighting of driveways, walkways, and parking areas) as well as light from vehicles. However, the increase in night lighting from this new development would not significantly increase the ambient light levels in the area, which are already dominated by existing light sources from surrounding commercial, office, and industrial uses and roadways. Pole-mounted lighting and fixtures included in the CABGF/CADC design would meet the applicable design and height standards of City Lighting Policy 4-3 and will be directed away from adjacent property lines. The design of the CABGF/CADC is subject to the City's design review process and will be required to utilize exterior materials that do not result in daytime glare, consistent with relevant General Plan policies and the City's Design Guidelines.

The transmission lines and utility poles associated with proposed PG&E infrastructure would not include any lighting. Lighting associated with the Trimble Substation Expansion would be limited to security lighting at the access gate and around the perimeter fenceline. Security lighting would be low intensity and would be directed downward. The off-site multi-modal improvements would not include any new lighting.

For the reasons described above, the proposed Project would have a less than significant light and glare impact. **(Less than Significant Impact)**

4.1.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative aesthetics impact?

The geographic area for cumulative aesthetic impacts is limited to the CABGF/CADC Site, Trimble Substation Expansion Site, PG&E transmission line routes, and adjacent properties from which the sites would be visible.

All cumulative projects occurring in the vicinity of the Project are urban in nature (primarily commercial, office, and industrial uses) and would be subject to applicable General Plan policies, development standards under the Zoning Code, the design review process to ensure consistency with applicable design guidelines (depending on the proposed use and location), as well as adherence to applicable lighting standards, and signage regulations. By requiring all cumulative projects to adhere to the City's measures, guidelines, and requirements, aesthetic impacts would be minimized or reduced. All cumulative projects would undergo individual review to ensure that site selection, building materials, heights, and lighting are implemented in a manner that does not result in significant visual impacts. For these reasons, there would not be a significant cumulative

aesthetic or visual impact. Furthermore, the proposed Project's contribution to this already less than significant cumulative impact would not be cumulatively considerable. **(Less than Significant Cumulative Impact)**

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is identified as Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.[23]

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.[24]

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.[25] Programs such as CAL FIRE's Fire and Resource Assessment Program are used to identify whether forest land, timberland, or timberland production areas could be affected are located on or adjacent to a project site.[26]

[23] California Department of Conservation. "DOC Maps: Agriculture." Accessed February 26, 2026. https://maps.conservation.ca.gov/agriculture/

[24] California Department of Conservation. "Williamson Act." http://www.conservation.ca.gov/dlrp/lca.

[25] Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).

[26] California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed February 26, 2026. http://frap.fire.ca.gov/.

4.2.1.2 *Existing Conditions*

CABGF/CADC Site

The CABGF/CADC Site is designated Urban and Built-Up Land by the California Department of Conservation's Important Farmland Map.[27] Urban and Built-Up Land is land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel, but is not Important Farmland (e.g., Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance). The CABGF/CADC Site is entirely surrounded by Urban Built-Up land.

The CBGF/CDC Site is located in the City's Industrial Park zoning district. There is no forest land located on or adjacent to the CBGF/CDC Site and it is not subject to a Williamson Act contract.[28]

Trimble Substation Expansion Site

The Trimble Substation Expansion site is designated Other Land.[29] Other land is not included in any other mapping category and common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. The Trimble Substation Expansion Site is surrounded by Urban Built-Up Land to the north, east, and south.

There is no forest land located on or adjacent to the Trimble Substation Expansion Site and the Site is not subject to a Williamson Act contract.[30]

PG&E Transmission Line Routes

The PG&E transmission line routes are located on land designated as Urban Built-Up Land and Other Land.[31] There is no forest land located on or adjacent to the transmission line routes nor are they subject to a Williamson Act contract.[32]

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[27] California Department of Conservation. "California Important Farmland Finder." Accessed April 10, 2026. https://maps.conservation.ca.gov/dlrp/ciff/

[28] Santa Clara County. "Williamson Act Properties. Accessed April 10, 2026. https://experience.arcgis.com/experience/034e46f2f4bc44d1ada505dd92940ff7.

[29] California Department of Conservation. "California Important Farmland Finder." Accessed February 26, 2026. https://maps.conservation.ca.gov/dlrp/ciff/.

[30] Santa Clara County. "Williamson Act Properties. Accessed February 26, 2026. https://experience.arcgis.com/experience/034e46f2f4bc44d1ada505dd92940ff7.

[31] California Department of Conservation. "California Important Farmland Finder." Accessed February 26, 2026. https://maps.conservation.ca.gov/dlrp/ciff/.

[32] Santa Clara County. "Williamson Act Properties. Accessed February 26, 2026. https://experience.arcgis.com/experience/034e46f2f4bc44d1ada505dd92940ff7.

4.2.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in a loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
f) Would the project result in a cumulatively considerable contribution to a cumulatively significant agricultural and forestry resources impact?	☐	☐	☐	☒
Would the project result in a cumulatively considerable contribution to a cumulatively significant agricultural and forestry resources impact?	☐	☐	☐	☒

4.2.2.1 *Project Impacts*

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

As described in Section 4.2.1.2 Existing Conditions, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located on the Project Component Sites. Therefore, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be converted to non-agricultural uses due to the Project. **(No Impact)**

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The Project Component Sites are zoned Industrial Park and are not subject to a Williamson Contract. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. **(No Impact)**

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

As described in Section 4.2.1.2 Existing Conditions, none of the Project Component Sites are zoned as, or adjacent to, forest land, timberland, or timberland zoned Timberland Production. Therefore, the Project would not conflict with existing zoning or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

d) Would the project result in a loss of forest land or conversion of forest land to non-forest use?

None of the Project Component Sites function as forest land. Therefore, the Project would not result in a loss of forest land or convert forest land to non-forest use. **(No Impact)**

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

As described above, no farmland or forest land is located on or near the Project Component Sites. The Project, therefore, would not involve other changes in the existing environment which could

result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. **(No Impact)**

4.2.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant agricultural and forestry resources impact?

The geographic area for cumulative agricultural and forestry resource impacts is the County of Santa Clara. The Project would have no impact on agricultural and forestry resources and, therefore, the Project has no potential to combine with other projects to result in cumulative impacts to these resources. **(No Cumulative Impact)**

4.3 Air Quality

This section was prepared by Atmospheric Dynamics, Inc. in accordance with the Commission's SPPE Application requirements pursuant to the power plant siting regulations, and the rules and regulations of the Bay Area Air District (Air District). This section presents the evaluation of emissions and impacts resulting from the construction and operation of the CABGF, which supports the CADC.

Additional modeling data to support the Air Quality and Public Health analyses can be found in Appendix F. The modeling is organized as follows:

- SubAppendix AQ1 – Emissions Data for Criteria Pollutants, Toxic Pollutants, and GHGs
- SubAppendix AQ2 – Equipment Specifications and Emissions Control System Information
- SubAppendix AQ3 – Air Quality Impact Modeling Support Data
- SubAppendix AQ4 – Construction and Miscellaneous Emissions Evaluation and Support Data
- SubAppendix AQ5 – Risk Assessment Support Data

4.3.1 Environmental Setting

Air quality in the San Francisco Bay Area Air Basin (SFBAAB) is typically better than most other areas of the state, due to its proximity to the Pacific Ocean and the weather patterns that dominate the region. The summer climate of the west coast and the Bay Area region is dominated by a semi-permanent high pressure centered over the northeastern Pacific Ocean. Because this high-pressure cell is quite persistent, storms rarely affect the California coast during the summer. Thus, the conditions that persist along the coast of California during summer are a northwest air flow and negligible precipitation. A thermal low-pressure area from the Sonoran-Mojave Desert also causes air to flow onshore over the San Francisco Bay Area much of the summer.

The steady northwesterly flow around the eastern edge of the Pacific high-pressure cell exerts a stress on the ocean surface along the west coast. This induces upwelling of cold water from below. Upwelling produces a band of cold water that is approximately 80 miles wide off San Francisco.

Air approaching the California coast, already cool and moisture-laden from its long trajectory over the Pacific, is further cooled as it flows across this cold bank of water near the coast, thus accentuating the temperature contrast across the coastline. This cooling is often sufficient to produce a high incidence of fog and stratus clouds along the Northern California coast in summer.

In winter, the Pacific High weakens and shifts southward, upwelling ceases, and winter storms become frequent. Almost all of the Bay Area's annual precipitation takes place in the November through April period. During the winter rainy periods, inversions are weak or nonexistent, winds are often moderate and air pollution potential is very low. During winter periods when the Pacific high

becomes dominant, inversions become strong and often are surface-based; winds are light and pollution potential is high. These periods are characterized by winds that flow out of the Central Valley into the Bay Area and often include Tule fog.

Air quality is determined by measuring ambient concentrations of criteria pollutants at various locations through a defined region. Degradation, or lack thereof, of air quality is determined by comparing past air concentrations to the current ambient air quality standards and establishing trends for the area in question. Toxic air contaminants (TACs) have no ambient air quality standards, and a health risk assessment (HRA) is typically conducted to evaluate whether risks of exposure to TACs will create an adverse impact.

4.3.1.1 *Existing Air Quality*

In 1970, the United States Congress instructed the United States Environmental Protection Agency (EPA) to establish standards for air pollutants, which were of nationwide concern. This directive resulted from the concern of the effects of air pollutants on the health and welfare of the public. The resulting Clean Air Act (CAA) set forth air quality standards to protect the health and welfare of the public. Two levels of standards were promulgated – primary standards and secondary standards. Primary national ambient air quality standards (NAAQS) are "those which, in the judgment of the administrator [of the EPA], based on air quality criteria and allowing an adequate margin of safety, are requisite to protect the public health (state of general health of community or population)." The secondary NAAQS are "those which in the judgment of the administrator [of the EPA], based on air quality criteria, are requisite to protect the public welfare and ecosystems associated with the presence of air pollutants in the ambient air." To date, NAAQS have been established for seven criteria pollutants as follows: sulfur dioxide (SO_2), carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sub-10-micron particulate matter (PM_{10}), sub-2.5-micron particulate matter ($PM_{2.5}$), and lead (Pb).

The criteria pollutants are those that have been demonstrated historically to be widespread and have a potential for adverse health impacts. The EPA developed comprehensive documents detailing the basis of, or criteria for, the standards that limit the ambient concentrations of these pollutants. The State of California has also established ambient air quality standards (AAQS) that further limit the allowable concentrations of certain criteria pollutants. Review of the established air quality standards are undertaken by both the EPA and the State of California on a periodic basis. As a result of the periodic reviews, the standards have been updated (i.e., amended, additions, and deletions) over the ensuing years to the present.

Each federal or state ambient air quality standard is comprised of two basic elements: (1) a numerical limit expressed as an allowable concentration, and (2) an averaging time which specifies the period over which the concentration value is to be measured. Table 4.3-1 presents the current federal and state ambient quality standards.

Table 4.3-1: California and National Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards Concentration	National Standards Concentration
Ozone	1 hour	0.09 ppm (180 µg/m^3)	-
	8 hours	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)
Carbon monoxide (CO)	8 hours	9.0 ppm (10,000 µg/m^3)	9 ppm (10,000 µg/m^3)
	1 hour	20 ppm (23,000 µg/m^3)	35 ppm (40,000 µg/m^3)
Nitrogen dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
	1 hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)
Sulfur dioxide (SO_2)	Annual Arithmetic Mean	-	0.030 ppm (80 µg/m^3)
	24 hours	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	3 hours	-	0.5 ppm (1300 µg/m^3)
	1 hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)
Suspended particulate matter or PM_{10} (10 micron)	24 hours	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	-
Suspended particulate matter or $PM_{2.5}$ (2.5 micron)	Annual Arithmetic Mean	12 µg/m^3	12.0 µg/m^3 (3-year average)
	24 hours	-	35 µg/m^3
Sulfates	24 hours	25 µg/m^3	-
Lead (Pb)	30 days	1.5 µg/m^3	-
	Calendar Quarter	-	1.5 µg/m^3
	Rolling 3-month Average	-	0.15 µg/m^3

ppm = parts per million, ppb=parts per billion, µg/m^3 = micrograms per cubic meter

Source: California Air Resources Board. "Table of Ambient Air Quality Standards." July 16, 2024. Accessed July 15, 2026. https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf.

Brief descriptions of health effects for the main criteria pollutants are as follows.

Ozone

Ozone is a reactive pollutant, which is not emitted directly into the atmosphere, but is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving precursor organic compounds (POC) and oxides of nitrogen (NO_x). POC and NO_x are known as precursor compounds for ozone. Significant ozone production generally requires ozone precursors to be present in a stable atmosphere with strong sunlight for approximately three hours. Ozone is a regional air pollutant because it is not emitted directly by sources but is formed downwind of sources of POC and NO_x under the influence of wind and sunlight. Short-term

exposure to ozone can irritate the eyes and cause constriction of the airways. Besides causing shortness of breath, ozone can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Carbon Monoxide

Carbon monoxide is a non-reactive pollutant that is a product of incomplete combustion. Ambient carbon monoxide concentrations generally follow the spatial and temporal distributions of vehicular traffic and are also influenced by meteorological factors such as wind speed and atmospheric mixing. Under inversion conditions, carbon monoxide concentrations may be distributed more uniformly over an area out to some distance from vehicular sources. When inhaled at high concentrations, carbon monoxide combines with hemoglobin in the blood and reduces the oxygen-carrying capacity of the blood. This results in reduced oxygen reaching the brain, heart, and other body tissues. This condition is especially critical for people with cardiovascular diseases, chronic lung disease, or anemia, as well as fetuses.

Particulate Matter (PM_{10} and $PM_{2.5}$)

PM_{10} consists of particulate matter that is 10 microns or less in diameter (a micron is one- millionth of a meter), and fine particulate matter, $PM_{2.5}$, which consists of particulate matter 2.5 microns or less in diameter. Both PM_{10} and $PM_{2.5}$ represent fractions of particulate matter, which can be inhaled into the air passages and the lungs and can cause adverse health effects. Particulate matter in the atmosphere results from many kinds of dust- and fume-producing industrial and agricultural operations, combustion, and atmospheric photochemical reactions. Some of these operations, such as demolition and construction activities, contribute to increases in local PM_{10} and $PM_{2.5}$ concentrations, while others, such as stationary source emissions, vehicular traffic, etc. affect regional PM_{10} and $PM_{2.5}$ concentrations.

Nitrogen Dioxide and Sulfur Dioxide

Nitrogen dioxide (NO_2) and sulfur dioxide (SO_2) are two gaseous compounds within a larger group of compounds, NO_x and sulfur oxides (SO_x), respectively, which are products of the combustion of fuel. NO_x and SO_x emission sources can elevate local NO_2 and SO_2 concentrations, and both are regional precursor compounds to particulate matter. As described above, NO_x is also an ozone precursor compound and can affect regional visibility. (NO_2 is the “whiskey brown” colored gas readily visible during periods of heavy air pollution.) Elevated concentrations of these compounds are associated with increased risk of acute and chronic respiratory disease. Additionally, sulfur dioxide and nitrogen oxides emissions can be oxidized in the atmosphere to eventually form sulfates and nitrates, which contribute to acid rain.

Lead

Gasoline-powered automobile engines used to be the major source of airborne lead in urban areas. Excessive exposure to lead concentrations can result in gastrointestinal disturbances, anemia,

kidney disease, and in severe cases of neuromuscular and neurological dysfunction. The use of lead additives in motor vehicle fuel has been eliminated in California, and lead concentrations have declined substantially as a result.

Hydrogen Sulfide

Hydrogen sulfide (H_2S) is a naturally occurring gas contained, as a for-instance, in geothermal steam from the Geysers. H_2S has a "rotten egg" odor at concentration levels as low as 0.005 parts per million (ppm). The state 1-hour standard of 0.03 ppm is set to reduce the potential for substantial odor complaints. At concentrations of approximately 10 ppm, exposure to H_2S can lead to health effects such as eye irritation.

Toxic/Hazardous Air Contaminants

"Toxic air contaminants" (TACs) are air pollutants that are believed to have carcinogenic or adverse non-carcinogenic effects but do not have a corresponding ambient air quality standard. There are hundreds of different types of toxic air contaminants, with varying degrees of toxicity. Sources of TACs include industrial processes such as petroleum refining, electric utility and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust.

TACs are regulated under both state and federal laws. Federal laws use the term "Hazardous Air Pollutants" (HAPs) to refer to the same types of compounds referred to as TACs under state law. Both terms generally encompass the same compounds, although the California TAC listing is considerably more extensive than the federal HAPs list. For the sake of consistency, this analysis will use TACs when referring to these compounds rather than HAPs. Under the Clean Air Act Amendments of 1990, approximately 190 substances are designated as TACs. Appendix AQ1 presents the annual emissions of the TACs.

Attainment Status

The EPA designates the attainment status of regional areas with respect to federal air quality standards, while the California Air Resources Board (CARB) designates the attainment status of regional areas of California with respect to state air quality standards. Local air districts in California play a vital role is such designations at both levels. These classifications depend on whether the monitored ambient air quality data shows compliance, or non-compliance with the ambient air quality standards, respectively. Unclassified means the area is in attainment or there is insufficient data to determine the classification. The CABGF/CADC site is located within Santa Clara County, under the jurisdiction of the Air District. Table 4.3-2 summarizes the attainment status for each of the criteria pollutants in the Air District with regards to both the federal and state standards.

Table 4.3-2: Attainment Status for the San Francisco Bay Area Air Basin

Pollutant	Averaging Time	Federal Designation	State Designation
Ozone	1 Hour	Nonattainment (Marginal)	Nonattainment (Transitional)
	8 Hour	Nonattainment	Nonattainment (Transitional)
CO	1 Hour	Attainment/ Unclassifiable	Attainment
	8 Hour	Attainment/ Unclassifiable	Attainment
NO_2	1 Hour	Attainment/ Unclassifiable	Attainment
	Annual AM	Attainment/ Unclassifiable	Attainment
SO_2	1 Hour	Attainment/ Unclassifiable	Attainment
	3 Hour	-	-
	24 Hour	-	Attainment
	Annual AM	TBD 2026	-
PM_{10}	24 Hour	Attainment	Nonattainment
	Annual AM	-	Nonattainment
$PM_{2.5}$	24 Hour	Nonattainment Moderate	-
	Annual AM (2012)	Attainment/ Unclassifiable	Attainment
	Annual AM (2024)	TBD 2026	-
Lead	30-day Avg	-	Attainment
	Calendar Qtr.	-	-
	Rolling 3 Month Avg	Attainment	-
Visibility Reducing PM (VRP)	8 Hour	-	Unclassified
Sulfates	24 Hour	-	Attainment
H_2S	1 Hour	-	Unclassified
Vinyl Chloride	24 Hour	-	No information

Source: Bay Area Air Quality District. "Air Quality Standards and Designation Status for the San Francisco Bay Area Basin." Accessed July 15, 2026. https://www.baaqmd.gov/en/about-air-quality/research-and-data/air-quality-standards-and-attainment-status.

Existing Ambient Air Quality Conditions

Table 4.3-3 provides the background ambient air concentrations of criteria pollutants for the previous three years as measured at certified monitoring stations near the Project Site. To evaluate the potential for air quality degradation as a result of the Project, modeled Project air concentrations are combined with the respective background concentrations as presented in Table 4.3-3 and used for comparison to the NAAQS and CAAQS.

Table 4.3-3: Measured Ambient Air Quality Concentrations by Year

Pollutant	Units	Average Time	Concentration Value Type	2021	2022	2023	2024
Ozone	ppb	1-Hr	CAAQS-1st Highs/3-year Max	0.098	0.090	0.087	0.04
Ozone	ppb	8-Hr	CAAQS-1st Highs/3-year Max	0.084	0.074	0.068	0.035
Ozone	ppb	8-Hr	NAAQS-4th Highs/3-year Avg	0.072	0.062	0.059	0.034
NO_2	ppb	1-Hr	CAAQS-1st Highs/3-year Max	47	47	59	38
NO_2	ppb	1-Hr	NAAQS-98th%s/3-year Avg	39	44	44	37
NO_2	ppb	Annual	CAAQS/NAAQS-AAM/3-year Max	8.73	9.46	9.28	11.7
CO	ppm	1-Hr	CAAQS-1st Highs/3-year Max	1.7	1.7	1.9	1.4
			NAAQS-2nd Highs/3-year Max	1.6	1.5	1.6	1.4
CO	ppm	8-Hr	CAAQS-1st Highs/3-year Max	1.5	1.4	1.4	1.1
			NAAQS-2nd Highs/3-year Max	1.3	1.3	1.4	1.0
SO_2	ppb	1-Hr	CAAQS-1st Highs/3-year Max	1.8	2	35.7	5
			NAAQS-99th%s/3-year Avg	2	2	2	5
		24-Hr	CAAQS-1st Highs/3-year Max	0.7	0.9	1.9	0.4
			NAAQS-2nd Highs/3-year Max	0.5	0.6	0.5	0.4
		Annual	CAAQS/NAAQS-AAM/3-year Max	0.17	0.22	0.09	0.09
PM_{10}	µg/m^3	24-Hr	CAAQS-1st Highs/3-year Max	134	42	41	53
			NAAQS-2nd Highs/3-year 4th High	91	41	41	48
		Annual	CAAQS-AAM/3-year Max	24.8	20.1	21.3	ND
$PM_{2.5}$	µg/m^3	24-Hr	NAAQS-98th%/3-year Avg	23	27	27	24
		Annual	CAAQS –AAM/3-year Max	8.9	10.1	8.2	9.2
			NAAQS-AAM/3-year Avg	8.9	10.1	8.2	9.2

Notes: Values for 158 East Jackson Street, San Jose, CA, and Rumhill Blvd., San Pablo, CA., stations are the nearest BAAD monitoring sites.

No data for any of the Air District counties for year 2025 was available on the EPA AIRS site as of 03/2026. PM10 data for Santa Clara County is not available for years after 2023. PM10 data derived from the closest monitor, i.e., Contra Costa County (San Pablo 0601131004).

Source: California Air Resources Board. "California Air Quality Data Statistics, 2021-2024 Data, ADAM Database." Accessed March 2026. http://www.arb.ca.gov/adam.

United States Environmental Protection Agency. "AIRs Data System, Monitor Values for 2021 to 2014," Accessed March 2026. https://www.epa.gov/outdoor-air-quality-data/monitor-values-report.

Tables are provided in SubAppendix AQ3 that present a detailed summary of the air quality monitoring data derived from the EPA AIRS and CARB ADAM systems. The values presented in Table 4.3-4 represent the derived background concentrations by pollutant for the established averaging times.

Table 4.3-4: Background Air Quality Data Summary

Pollutant and Averaging Time	AQ Data Value	Units	Background Value (µg/m^3)
Ozone – 1-hour Maximum CAAQS	0.098	ppm	192.4
Ozone – 8-hour Maximum CAAQS	0.084	ppm	164.9
Ozone – 3-year average 4th High NAAQS	0.064	ppm	102.1
PM_{10} – 24-hour Maximum CAAQS	134	µg/m^3	53
PM_{10} - 24-hour 3-year 4th High NAAQS	41	µg/m^3	48
PM_{10} – Annual Maximum CAAQS	24.8	µg/m^3	24.8
$PM_{2.5}$ – 3-Year Average of Annual 24-hour 98th Percentiles NAAQS	25.7	µg/m^3	26
$PM_{2.5}$ – Annual Maximum CAAQS	10.1	µg/m^3	10.1
$PM_{2.5}$ - 3-Year Average of Annual Values NAAQS	9.1	µg/m^3	9.2
CO – 1-hour Maximum CAAQS	1.9	ppm	2,176
CO - 1-hour High, 2nd High NAAQS	1.6	ppm	1,832
CO – 8-hour Maximum CAAQS	1.5	ppm	1,603
CO - 8-hour High, 2nd High NAAQS	1.3	ppm	1,603
NO_2 – 1-hour Maximum CAAQS	59	ppb	111.0
NO_2 - 3-Year Average of Annual 98th Percentile 1-hour Daily Maxima NAAQS	42.3	ppb	78.5
NO_2 – Annual Maximum CAAQS/NAAQS	9.46	ppb	17.8
SO_2 – 1-hour Maximum CAAQS	35.7	ppb	93.4
SO_2 - 3-Year Average of Annual 99th Percentile 1-hour Daily Maxima NAAQS	2	ppb	7.85

Pollutant and Averaging Time	AQ Data Value	Units	Background Value (µg/m³)
SO_2 – 3-hour Maximum NAAQS (Not Available - Used 1-hour Maxima)	35.7	ppb	93.4
SO_2 – 24-hour Maximum CAAQS	1.9	ppb	4.97
SO_2 - 24-hour High, 2nd High NAAQS	0.9	ppb	1.6
SO_2 – Annual Maximum NAAQS	0.22	ppb	0.6

Values for 158 East Jackson Street, San Jose, CA, and Rumhill Blvd., San Pablo, CA., CARB data used for AAM for PM_{10} for the period 2021-2023.

Conversion of ppm/ppb measurements to µg/m³ concentrations based on:
µg/m³ = ppm x 40.9 x MW, where MW = 48, 28, 46, and 64 for ozone, CO, NO_2, and SO_2, respectively.

4.3.1.2 *Regulatory Framework*

Federal

At the federal level, EPA is responsible for overseeing implementation of the federal Clean Air Act and its subsequent amendments (CAA). As required by the federal CAA, NAAQS have been established for the criteria pollutants described above.

New Source Performance Standards

The CABGF will be subject to the applicable New Source Performance Standards (NSPS) standards that are identified below. A description of the applicant's compliance plan to meet each standard is included.

40 CFR Part 60, Subpart IIII

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines became effective July 11, 2006. The diesel engines are subject to Subpart IIII. The proposed engines are EPA Tier 2 rated and will be equipped with Best Available Control Technology (BACT) to meet Tier 4 emissions standards.

Compression Ignition (CI) Diesel Engines Emission Standards

Based on 40 CFR 60.4202, emergency CI engines rated at > 560 kW are subject to the emissions standards in 40 CFR 89.112, Table 1, as follows:

- Tier 2 – NO_x 6.0 g/kw-hr = 4.5 g/bhp-hr
- Tier 2 – NMHC 0.4 g/kw-hr = 0.3 g/bhp-hr
- Tier 2 – CO 3.5 g/kw-hr = 2.6 g/bhp-hr
- Tier 2 – PM10/2.5 0.20 g/kw-hr = 0.15 g/bhp-hr
- SO_2 fuel sulfur content not to exceed 15 ppmw

The proposed diesel-fired engines will be equipped with SCR catalyst systems (or equivalents) and DPF which will result in the engines meeting the EPA/CARB Tier 4 emissions standards, as well as the BACT requirements of the Air District for engines rated at greater than 1000 bhp.

40 CFR Part 60 Subpart ZZZZ

The proposed CI engines are exempt from the requirements of Subpart ZZZZ (63.6590 (c)(1)) if the engines comply with the emissions limitations specified in 40 CFR 60 Subpart IIII. See discussion above.

State

California Air Resources Board

CARB is the state agency that retains authority to regulate mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act. The CARB also establishes and revises the CAAQS.

Regional

Air District's Role in Air Quality

The Air District is the primary agency responsible for assuring that the National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively) are attained and maintained in the Bay Area. Air District's jurisdiction includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo and Santa Clara counties, and the southern portions of Solano and Sonoma counties. The Air District's responsibilities in improving air quality in the region include: preparing plans for attaining and maintaining air quality standards; adopting and enforcing rules and regulations; issuing permits for stationary sources of air pollutants; inspecting stationary sources and responding to citizen complaints; monitoring air quality and meteorological conditions; awarding grants to reduce mobile emissions; implementing public outreach campaigns; and assisting local governments in addressing climate change.

Under the Small Power Plant Exemption process with the Commission the Air District acts as a Responsible Agency when it has limited discretionary authority over a portion of a project but does not have the primary discretionary authority of a Lead Agency. As a Responsible Agency, Air District may coordinate the environmental review process with the lead agency regarding Air District's permitting process, provide comments to the Lead Agency regarding potential impacts, and recommend mitigation measures.

The Air District is the primary regional agency responsible for attaining and maintaining air quality conditions in the SFBAAB through a comprehensive program of planning, regulation, and enforcement. Examples of the Air District's primary air plans and regulations are described below. This section also briefly describes the regulations which would apply to the CABGF as set forth in

the Air District Rules and Regulations. The Project will require a New Source Review permit with the Air District.

Clean Air Plan

The 2017 Bay Area Clean Air Plan was adopted by the Air District on April 19, 2017, and provides a regional strategy to protect public health and protect the climate. The 2017 Bay Area Clean Air Plan updates the most recent Bay Area ozone plan, as well as the 2010 Clean Air Plan, and is a multi-pollutant air quality plan addressing four categories of air pollutants:

1) Ozone and the primary ozone precursor pollutants (VOCs and NO_x)
2) Particulate matter (PM_{10} and $PM_{2.5}$), as well as their precursors
3) TACs/HAPs
4) Greenhouse gases

Air District Regulation 2, Rule 2 – New Source Review (NSR)

This rule applies to all new or modified sources requiring a Permit to Operate for any new source with actual or potential emissions above the rule trigger limits. The rule also specifies when BACT is required, when offsets are required and the offset ratios, as well the requirements for the required impact analyses, etc.

BACT Requirements (Air District Policy)

A review of BACT for CI-Stationary Emergency Standby engines rated at greater than 1000 BHP (Air District Policy Memo, BACT Determination for Diesel Back-Up Engines Greater than or equal to 1,000 Brake Horsepower, 12/21/2020) indicates that BACT for engines in the stated size range must be in compliance with the EPA Tier 4-Final standards as follows:

- PM 0.02 g/bhp-hour
- NO_x = 0.5 g/bhp-hour
- NMHC = 0.14 g/bhp-hour
- CO = 2.6 g/bhp-hour
- SO_2 = fuel sulfur content not to exceed 15 parts per million weight (0.005 g/bhp-hour)

The engines proposed for the CABGF, which are all rated at greater than 1,000 BHP will meet these requirements, so BACT is satisfied.

Additionally, the Applicant is proposing, based upon the use of the control systems designed for use on both engine types, that the PM emissions will be limited to 0.018 g/bhp-hr. This limit is below the standard Tier 4 compliance level as well as the District BACT limit.

NSR Offset Requirements

Required emissions offsets as identified in this application will be obtained in compliance with the Regulation 2 Rule 2 NSR rule provisions in Section 302. These provisions are discussed as follows:

- Pursuant to the Air District NSR Rule (Regulation 2 Rule 2), section 2-2-302, offsets must be provided for NO_x or POC (VOC is used in this application), for any source with potential emissions greater than 10 tons/year. For sources which emit NO_x or VOC in excess of 10 (tons per year) tpy but less than 35 tpy, these offsets can be provided by either of the two methods outlined in subsections 302.1.1 or 302.1.2 as follows; (1) the APCO must provide the required offsets from the Small Facility Bank Account, or (2) if the Small Facility Bank Account is exhausted then it is the responsibility of the Applicant to provide the required offsets to mitigate the proposed emissions net increase. VOC emissions from the proposed facility are less than 10 tpy, so VOC offsets are not required under the District NSR rule. NO_x emissions for the proposed facility are greater than 10 tpy but less than 35 tpy, and as such, NO_x offsets must be secured at a ratio of 1.15:1 for any un-offset cumulative increase in emissions. Presently, NO_x offsets cannot be acquired from the Small Facility Offset Bank so the applicant, as required by Air District rules, will supply the offsets through the purchase of emission reduction credits pursuant to option (2) above in compliance with the Air District guidance Policy Memo dated 6/3/2019 (Calculating PTE for Emergency Backup Power Generators).
- Offset mitigation for PM_{10}, $PM_{2.5}$, and sulfur dioxide emissions is addressed in Section 2-2-303. This section specifies that offsets are only required if the source has the potential to emit any of these pollutants in excess of 100 tons per year. Emissions of PM_{10}, $PM_{2.5}$, and SO2 are well below the 100 tpy threshold value, therefore mitigation for emissions at these low emissions levels is not warranted, and such mitigation is not required under Regulation 2 Rule 2.

Air District Regulation 9 Rule 8 – NO_x and CO from Stationary Internal Combustion Engines

- Section 9-8-304 requires that emergency CI engines rated at greater than 175 bhp meet the following limits (at 15% O_2 dry basis): NO_x 110 ppm and CO 310 ppm. But, Section 9-8-110.5 exempts “emergency standby engines” from this requirement. Therefore, the proposed facility generators will be exempt from this requirement.
- Section 9-8-330 requires that emergency CI engines be limited to non-emergency operations of less than or equal to 50 hours per year. Based on Section 9-8-330, the engines will be limited to no more than 50 hours per year.
- Section 9-8-530 requires that each engine be equipped with a non-resettable totalizing meter, and the following must be logged and reported to the AQMD:
    a. Total hours run each year
    b. Total hours of emergency operation per year
    c. Specify the nature of each emergency operation

  Each of the facility generators will be equipped with a non-resettable totalizing meter

and the total hours of emergency operation per year and the nature of emergency operations will be documented.

Except as noted for the requirements of Section 9-8-304 above, the proposed engine models will comply with the applicable requirements.

Air District Regulation 2, Rule 5 – New Source Review of Toxic Air Contaminants

This rule provides for the review of new and modified sources of TAC emissions to evaluate potential public exposure and health risk. The rule also specifies when toxics-BACT is required, trigger limits for further analysis based on substance specific emissions levels (both short and long term), risk assessment procedures, etc. Emergency standby engines have a limited exemption from Regulation 3 Rule 5 Section 2-5-111 which reads as follows: Limited Exemption, Emergency Standby Engines: This rule shall not apply to toxic air contaminant emissions occurring from emergency use of emergency standby engines (as defined in Regulation 9, Rule 8, Section 231 or the applicable CARB ATCM)[33]; or from initial start-up testing; or from emission testing of emergency standby engines required by the Air Pollution Control Officer.

4.3.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Note: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the determinations.

4.3.2.1 *Significance Thresholds*

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and

[33] California Code of Regulations, Title 17, 93115-93115.15, Final Regulation Order, Airborne Toxic Control Measure for Stationary Compression Ignition Engines, May 19, 2011.

must be based to the extent possible on scientific and factual data. The Commission has considered the air quality thresholds updated by the Air District in April 2023 and regards these thresholds to be based on the best information available for the SFBAAB and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The Air District CEQA Air Quality thresholds for criteria air pollutants and fugitive dust used in this analysis are identified in Table 4.3-5. Table 4.3-6 below lists the Air District health risk and hazards thresholds for single-source and cumulative-sources.

Table 4.3-5: Bay Area Air District Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds*	Operation Thresholds	Operation Thresholds
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
ROG and NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	

Notes: ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; $PM_{2.5}$= fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; CO = carbon monoxide

* The Air District recommends for construction projects that require less than one year to complete, lead agencies should annualize impacts over the scope of actual days that peak impacts would occur rather than over the full year. Additionally, for phased projects that results in concurrent construction and operational emissions. Construction-related exhaust emissions should be combined with operational emissions for all phases where construction and operations overlap.

Source: Bay Area Air Quality Management District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Pages 3-5 and 3-6.

Table 4.3-6: Bay Area Air District Health Risks and Hazards Thresholds

Health Risk	Single Source	Combined Cumulative Sources
Cancer Risk	10 per one million	100 per one million
Non-Cancer Hazard Index	1.0	10.0
Annual $PM_{2.5}$ Concentration	0.3 µg/m^3	0.8 µg/m^3 (average)

Notes: µg/m^3 = micrograms per cubic meter; $PM_{2.5}$= fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less

Thresholds are applicable to construction and operational activities.

Source: Bay Area Air Quality Management District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023.

4.3.2.2 *Project Impacts*

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

The Project would not conflict with or obstruct the implementation of the applicable air quality plan due to the following:

- The Project will comply with all applicable rules and regulations of the Air District regarding emissions of criteria pollutants.
- The Project will comply with all applicable rules and regulations of the Air District regarding emissions of toxic pollutants.
- The proposed engines at the Project will be certified with or comply with the applicable federal Tier 4 emissions standards for emergency standby electrical generation CI engines.
- The Project will comply with all applicable provisions of the 2017 Air District Air Quality Implementation Plan.
- The Project will obtain and maintain all required air quality related permits from the Air District, and requirements imposed by the Commission.

For these reasons, impacts would be less than significant. **(Less than Significant Impact)**

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

As discussed below in Section 4.3.3.3 Project Emissions, Air Quality Impact Analysis, and Health Risk Assessment, the Project would not result in a cumulatively considerable net increase of any criteria

pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard, due to the following:

- The use of best management practices during the construction phase will ensure that the emissions do not result in a cumulative considerable net increase of any non-attainment pollutants. These emissions are generally short term in nature and vary widely from day to day.
- The project will comply with the current BACT and Toxics BACT standards as adopted by the Air District.
- See offset mitigation requirements under the NSR discussion above applicable to operations emissions.

For these reasons, impacts would be less than significant. **(Less than Significant Impact)**

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

The project would not expose sensitive receptors to substantial pollutant concentrations due to the following:

- The air quality impact analysis presented herein shows that the project will not cause or contribute to a violation of any state or federal ambient air quality standard.
- The construction and operational health risk assessments presented herein indicate that the emissions of toxic air contaminants from the Project will not cause a significant risk, as defined using the thresholds presented in Table 4.3-6 above, to any sensitive or non-sensitive receptor with respect to cancer, chronic, or acute impacts.

For these reasons, impacts would be less than significant. **(Less than Significant Impact)**

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The Project would not result in other emissions or odors that would adversely affect a substantial number of people due to the following:

- Similar facilities, both larger and smaller in scale, have not been identified as sources of odors that would adversely affect off-site receptors.
- The Project is not one of the Project types listed in the Air District CEQA guidelines as producing odors that may affect off-site receptors.
- The applicant has not identified any operational or construction practices, that are

planned for use at the Project Site, which would generate substantial amounts of odors that would affect off-site receptors.

4.3.2.3 *Project Emissions, Air Quality Impact Analysis, and Health Risk Assessment*

Project Emissions

Construction

Project construction emissions of CO, VOCs, NO_x, SO_2, PM_{10}, $PM_{2.5}$, and CO_2e were evaluated. Detailed construction emission calculations are presented in Sub-Appendix AQ4 (see Appendix F). On-site construction emissions from construction of the Project will result from site preparation and grading activities, building erection and parking lot construction activities, "finish" construction activities, and the use of on-site construction equipment. Construction emissions from the Project include emissions from the CABGF and CADC. Off-site construction emissions will be derived primarily from materials transport to and from the site, worker travel, etc. In addition, off-site construction emissions for the proposed Trimble Substation Expansion, as well as the above-ground and below-ground transmission line options connecting the site to the substation expansion were also evaluated. Emissions from the construction schedules, i.e., the single shift 22-month scenario, and the double shift 17-month scenario were estimated using the California Emissions Estimator Model (CalEEMod) program. Estimated onsite criteria pollutant construction emissions for both "shift scenarios" are summarized in Table 4.3-7.

Construction of the above noted shift scenarios are anticipated to start as follows: (1) the single shift 22-month scenario will start on or about 9/1/2027, and (2) the double shift 17-month scenario will also start on or about 9/1/2027. Construction support data and the CalEEMod analysis output are presented in Sub-Appendix AQ4. The Air District CEQA Air Quality Guidelines considers exposure of sensitive receptors to air pollutant levels that result in an unacceptable cancer risk or hazard to be significant. Air District recommends a 1,000-foot zone of influence around Project boundaries. Since construction activities are typically temporary and mitigation measures as delineated below are proposed to be implemented, and since there are no identified sensitive receptors within 1,000 feet of the site boundary, community risk impacts from construction activities would be less than significant.

Table 4.3-7: Mitigated Criteria Pollutant Emissions from Construction Activities

Scenario/Year	NO_x	CO	VOC	SO_x	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)	CO_2e (metric tons)
Single Shift 22- Month Scenario							
Max Construction Year	2028	2028	2020	2028	2028	2028	2028
Max Construction Year (tons)	1.41	4.58	2.93	0.0073	0.016	0.015	657.1
Construction Period (tons/year)	2.54	7.45	3.03	0.012	0.163	0.025	1057.5

Scenario/Year	NO_x	CO	VOC	SO_x	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)	CO_2e (metric tons)
Average Daily Emissions (pounds)	9.39	30.56	39.11	0.048	0.104	0.102	-
Air District Significance Thresholds (pounds/day)	54	-	54	-	82	54	-
Exceeds Thresholds	No	NA	No	NA	No	No	NA
Double Shift 17-Month Scenario							
Max Construction Year	2028	2028	2028	2028	2028	2020	2028
Max Construction Year (tons)	3.00	7.56	2.09	0.012	0.025	0.025	1044.6
Construction Period (tons/year)	3.28	9.37	3.07	0.015	0.031	0.030	1305.2
Average Daily Emissions (pounds)	19.97	50.37	13.95	0.08	0.170	0.167	-
Air District Significance Thresholds (pounds/day)	54	-	54	-	82	54	-
Exceeds Thresholds	No	NA	No	NA	No	No	NA

Notes: Construction schedule for each "shift" proposal is as follows:

Single shift scenario – 22 months, ~550 days, 6-day work week

Double shift scenario – 17 months, ~425 days, 6-day work week

Each shift will be 10 hours/day reduced by 2 hours/day due to labor work breaks and equipment maintenance and fueling periods.

Average daily emissions are based on the max construction year as noted above for each scenario.

Source: ADI CalEEMod analysis, September 2026 contained in Sub-Appendix AQ4.

As shown in Table 4.3-7, construction of the Project would not generate VOCs, NO_x, SO_x, PM_{10} and $PM_{2.5}$ emissions in excess of Air District's numeric significance thresholds. The Air District's CEQA Guidelines consider fugitive dust impacts to be less than significant through the application of best management practices (BMPs). These measures are included in the Project as a PDM.

Air Quality

PDM AIR-1: **Fugitive Dust Best Management Practices**. To incorporate the Bay Area Air District (Air Districts recommendations for Best Management Practices (BMPs) to control fugitive dust, the Project Owner shall implement a construction emissions control plan that has been reviewed and approved by the Director of Planning, Building, and Code Enforcement or the Director's designee prior to the issuance of any grading or building permits, whichever occurs earliest. The Project Owner shall implement the following measures during construction:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 5 mph.
- All new roadways, driveways, and sidewalks shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted wood chips, mulch, or gravel.
- Equipment idling times shall be minimized to 5 minutes per the Air Toxics Control Measure (ATCM). Idling time signage shall be provided for construction workers at all access points.
- Properly tune and maintain all construction equipment in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- Minimize the amount of excavated material or waste materials stored at the site.
- Post a publicly visible sign with the telephone number and name of the person to contact regarding dust complaints and the Air District telephone number. The contact person shall implement corrective measures, as needed, within 48 hours, and the Air District shall be informed of any legitimate complaints received to verify compliance with applicable regulations.

Operation

Operational emissions of NO_x, VOCs, CO, SO_2, PM_{10}, $PM_{2.5}$, and GHGs were evaluated. Diesel particulate matter (DPM) which is the approved surrogate representing "whole diesel exhaust" for purposes of health risk evaluations, was the only TAC considered to result from operation of the Project. Detailed operation emission calculations are presented in Sub-Appendix AQ1. Primary operation emissions are a result of diesel fuel combustion from the standby diesel generators, emissions from the building cooling systems, fugitive emissions from fuel storage, and refrigerant use (system leakage). Secondary operational emissions from facility upkeep, such as architectural coatings, consumer product use, landscaping, water use, waste generation, natural gas use for comfort heating, electricity use, off-site vehicle trips for worker commutes and material deliveries were not considered significant. Each of the primary emission sources are described in more detail below.

Stationary Sources

The Project's 44 Caterpillar standby diesel generators will be comprised of the following equipment:

- 42 – CAT 3516E HPD diesel-fired engines, each rated at 4,393 HP (3,000 kilowatts of electrical power) at 100 percent Load
- 2 – CAT 3512C diesel-fired engines, each rated at 2,206 HP (1,500 kilowatts of electrical power) at 100 percent Load

The generators proposed for installation are made by Caterpillar and will incorporate emissions control systems to meet Tier 4 emissions standards. The engines will be equipped with DPFs to reduce the diesel particulates to less than or equal to 0.02 grams/brake horse-power hour (g/bhp-hr), and catalyst systems for the control of NO_x, CO, and VOCs. The control systems result in engine emissions compliance with the EPA Tier 4 standards and with Air District BACT. Ammonia slip from the control system will not exceed 10 ppm. All generators would be operated routinely (i.e., readiness and maintenance testing) to ensure that they would function normally during an emergency event.

The CADC building (which will be comprised of six data halls) will be equipped with the following systems to provide cooling for the data center and administrative areas:

Each of the six data halls will be equipped with:

- Six chillers plus one additional chiller (for redundancy) for a total of seven chillers
- Model-GeoClima TMA 4D2100B (C32 13 1W) (see specifications in Sub-Appendix AQ-2)
- Proposed refrigerant: R513A with a current GWP value of 629.5
- System leak rate will be less than or equal to 5 percent (wt) per year.
- Each chiller will hold a refrigerant charge of 1340.4 lbs.

The above results in a total system comprised as follows:

- 42 chillers
- Total system refrigerant charge of approximately 56,297 pounds

The facility will also utilize direct outside air systems (DOAS) as follows:

- ~12 DOAS units with no redundant units
- AAON RTU-2 (see specifications in Appendix AQ-2)
- Proposed refrigerant: R454B with a current GWP value of 466
- System leak rate will be less than or equal to 5 percent (wt) per year.
- Each DOAS will hold a refrigerant charge of 59.92 lbs.

The above results in a total DOAS comprised as follows:

- ~12 Units
- Total system refrigerant charge of approximately 710.04 pounds

Neither of the above proposed cooling systems will discharge process or blowdown water to the atmosphere.

Sub Appendix AQ1 presents the detailed emissions calculations for the proposed engines, fuel storage tanks, and cooling systems (refrigerant losses). Sub-Appendix AQ2 contains the manufacturers specification sheets for the engines, engine add-on air pollution control systems, and the building cooling systems.

During routine readiness testing, criteria pollutants and TACs (as DPM) would be emitted directly from the generators. Criteria pollutant emissions from generator testing were quantified using information provided by the manufacturer, as specified in Sub-Appendix AQ1. The SO2 emissions were based on the maximum sulfur content allowed in California diesel (15 parts per million by weight), and an assumed 100 percent conversion of fuel sulfur to SO2. The DPM emissions resulting from diesel stationary combustion were assumed equal to PM10 and PM2.5 emissions. For conservative evaluation purposes, it was assumed that testing would occur for no more than 50 hours per year, which is the limit specified by the Airborne Toxic Control Measure for Stationary Toxic Compression Ignition Engines (Title 17, Section 93115, CCR)34. The Applicant is not proposing a test schedule, i.e., hours versus load points. Testing will be done based upon the Applicants judgment, taking into account the manufacturers recommendations, staff availability, and need. Maintenance and readiness testing may occur at loads ranging from 10 to 100 percent load. For purposes of this application, emissions were assumed to occur at 100 percent load. Tables AQ1-1 and AQ1-2 in Sub-Appendix AQ1 present the engine emissions based upon the 100 percent load point, number of engines tested, etc. The Ammonia emissions, calculated as slip from the SCR on

[34] California Code of Regulations, Title 17, 93115-93115.15, Final Regulation Order, Airborne Toxic Control Measure for Stationary Compression Ignition Engines, 5/19/2011.

the engines, is also provided in Sub-Appendix AQ1. The engines were evaluated for the following emissions scenarios:

- CAT 3516E HPD Engines:
    - Each large engine running for 100 hours per year for Declared Emergency operations, at 100 percent load, at the guaranteed emissions levels from the Tier 4 control systems.
    - Each large engine running for 50 hours per year for Maintenance and Readiness operations, at 100 percent load, using composite emissions factors to address both uncontrolled and controlled emissions during such testing.
    - Ammonia slip from the SCR will be limited to 10 ppm.
- CAT 3512C Engines:
    - Each small engine running for 100 hours per year for Declared Emergency operations, at 100 percent load, at the guaranteed emissions levels from the Tier 4 control systems.
    - Each small engine running for 50 hours per year for Maintenance and Readiness operations, at 100 percent load, using composite emissions factors to address both uncontrolled and controlled emissions during such testing.
    - Ammonia slip from the SCR will be limited to 10 ppm.

The tables (Table 4.3-8, Table 4.3-9, Table 4.3-10, and Table 4.3-11) which follow present emissions summaries for the two engines for each of the scenarios noted above in terms of the worst case hourly, daily, and annual emissions. Maximum daily emissions are based on the assumption that only eight of the 3516E HPD engines will be tested on any day (and the eight engines will not be run concurrently).

Table 4.3-8: Emergency Operations Emissions Summary for CAT 3516E HPD and CAT 3512C Engines

Period	NO_x	CO	VOC	SO_2	$PM_{10}/PM_{2.5}$	CO_2e
CAT 3516E HPD						
Max Hourly, pounds	174.33	906.51	48.81	1.74	6.28	-
Max Daily, pounds	4,183.90	21,756.29	1,171.49	41.84	150.62	-
Max Annual, tons	8.72	45.33	2.44	0.09	0.31	8,215
3516E HPD as defined above. 100 hours/yr emergency operations. A total of 36 engines in operation. The redundant engines are not run during emergencies.						
CAT 3512C						
Max Hourly, pounds	4.86	25.29	1.36	0.05	0.18	-
Max Daily, pounds	116.72	606.96	32.68	1.17	4.20	-

Period	NO_x	CO	VOC	SO_2	$PM_{10}/PM_{2.5}$	CO_2e
Max Annual, tons	0.24	1.26	0.07	0.002	0.009	226
3512C as defined above. 100 hours/year emergency operations. A total of two engines in operation.						

Table 4.3-9: Maintenance and Readiness Testing Emissions Summary for CAT 3516E HPD and CAT 3512C Engines (50 Hours per Year)

Period	NO_x	CO	VOC	SO_2	$PM_{10}/PM_{2.5}$	CO_2e
CAT 3516E HPD						
Single Engine Max Hourly, pounds	24.21	25.18	1.36	0.05	0.174	-
8 Engines Max Daily, pounds	193.7	201.45	10.85	0.39	1.40	-
All Engines Max Annual, tons	25.42	26.44	1.42	0.05	0.18	4,792
CAT 3512C						
Single Engine Max Hourly, pounds	12.16	12.65	1.07	0.024	0.088	-
2 Engines Max Daily, pounds	24.32	25.29	2.14	0.049	0.175	-
All Engines Max Annual, tons	0.61	0.63	0.05	0.001	0.004	113

Table 4.3-10: Emergency Operations Emissions Summary for CAT 3516E HPD and CAT 3512C Engines

Period	NO_x	CO	VOC	SO_2	$PM_{10}/_{2.5}$	CO_2e
CAT 3516E HPD						
Max Annual, tons	8.72	45.33	2.44	0.09	0.31	8215
CAT 3512C						
Max Annual, tons	0.24	1.26	0.07	0.002	0.009	226

Table 4.3-11: Maintenance and Readiness Testing Emissions Summary for CAT 3516E HPD and CAT 3512C Engines

Period	NO_x	CO	VOC	SO_2	$PM_{10}/_{2.5}$	CO_2e
CAT 3516E HPD						
Max Annual, tons	25.42	26.44	1.42	0.05	0.18	4792
CAT 3512C						
Max Annual, tons	0.61	0.63	0.05	0.001	0.004	113

Table 4.3-12 below presents the maximum daily and annual emissions data for the various testing scenarios in comparison to the Air District CEQA significance thresholds.

Table 4.3-12: Facility Scenario Emissions and Air District CEQA Significance Levels (Maintenance and Readiness Testing)

Scenario/ Pounds Per Day	NO_x	CO	VOC	SO_2	PM_{10}	$PM_{2.5}$
Air District CEQA Thresholds	54	NA	54	NA	82	54
Worst Case Daily Engine Emissions[1]	193.7	201.45	10.85	0.39	1.40	1.40
Fuel VOC Losses	-	-	0.085	-	-	-
Daily Emissions	193.7	201.45	10.85	0.39	1.40	1.40
Significance Threshold Exceeded	Yes	NA	No	NA	No	No
Tons Per Year	**NO_x**	**CO**	**VOC**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Air District CEQA Thresholds	10	AAQS	10	NA	15	10
Fuel VOC Losses	-	-	0.0162	-	-	-
Worst Case Annual Engine Emissions[2]	26.03	27.07	1.47	0.051	0.184	0.184
Annual Emissions	26.03	27.07	1.47	0.051	0.184	0.184
Significance Threshold Exceeded	Yes	NA	No	NA	No	No

[1] Based on the emissions for an eight engine test day (8 – 3516E HPD engines).

[2] Based on the summation of the CAT 3516E HPD and CAT 3512C engines.

Note: CO_2e emissions are 4,905 tons per year (4,449 metric tons per year) from Maintenance and Readiness Testing.

The following should be noted with respect to Table 4.3-12 above.

- NO_x emissions exceed the Air District CEQA significance levels on the days when the eight engine Maintenance and Readiness tests occur, and on a tons per year basis (total emissions from all engines).
- The emissions of NO_x may be mitigated through the participation in the Air District ERC Bank, or other alternative methods as negotiated with the Air District.

Fuel Storage (Working and Breathing) VOC Emissions

Each stacked pair of the large CAT 3516E HPD engines will be equipped with an approximate 10,400 gallon belly storage tank, while the upper engine of the pair will also have a 500 gallon day tank. Each of the CAT 3512C engines will be equipped with an approximate 2,900 gallon belly storage tank. VOC working and breathing losses (for the 44 proposed tanks) are presented

in Appendix AQ-1, and summarized as follows[35]:

- Total VOC losses = 0.0162 typ or 31.2 pounds per year or 0.085 pounds per day

GHG Emissions from Refrigerant Use

GHG emissions from the cooling systems using refrigerants are as follows:

- 894.35 tpy or 811.2 metric tons per year

SF_6 Use in Electrical Breakers

SF_6 Emissions resultant from electrical breaker leakage are as follows:

- 20.3 metric tons/year

Table 4.3-13 presents the summation of emissions for all engines for the maximum of the scenarios noted above (i.e., the 150 hours per year) criteria per the Air District permitting policy criteria.

Table 4.3-13: Air District 150 Hours per Year Emissions Summation (Tons per Year)

Engines	NO_x	CO	VOC	SO_2	$PM_{10}/_{2.5}$	CO_2e
CAT 3516E HPD + CAT 3512C	35.0	73.66	3.99	0.142	0.51	13,364

Note: Summation for both engines types.
The total metrics tons of CO_2e equates to 12,105 metric tons.
These values are NOT the NSR offset applicability values.

Table 4.3-14 presents data on the DPM emissions levels (worst case) for both models of engines.

Table 4.3-14: Toxic Air Contaminant (DPM) Emissions from the Proposed Engines (Per Engine Basis)

Scenario/ DPM Emissions	CAT 3516E HPD	CAT 3512C
Maximum Annual, pounds	8.70	4.40
Maximum Hourly, pounds	0.174	0.088

Notes: DPM is the approved surrogate compound for diesel fuel combustion for purposes of health risk assessment. Annual emissions for each engine are based on the max allowed runtime of 50 hours per year, Maintenance and Readiness testing as defined.

Table 4.3-15 presents the hourly and annual fuel use values for the Maintenance and Readiness operational scenario as outlined above.

[35] Compilation of Air Pollution Emission Factors, Volume I, Fifth Edition; AP-42, USEPA, as amended May 28, 2025 https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-stationary-sources. See Appendix AQ1, Tables AQ1-3,-4,-5.

Table 4.3-15: Maintenance and Readiness Testing Engine Fuel Use Values

Scenario/ Fuel Use, gallons (per engine basis)	CAT C175	CAT 3512C
Maximum Hourly, gallons	204.3	101.3
Maximum Annual, gallons	10,215	5,065
Total Annual Fuel Use (All Engines)		
Annual Fuel Use, gallons	439,160	

Miscellaneous Operational Emissions

Miscellaneous emissions from CADC/CABGF operational activities (subsequent to full buildout) such as worker travel, deliveries, energy and fuel use for facility electrical, heating and cooling needs, periodic use of architectural coatings, landscaping, etc. were evaluated by CalEEMod. These emissions are presented in Table 4.3-16.

Table 4.3-16: Miscellaneous Operational Emissions

Scenario/Pounds per Day	NO_x	CO	VOC	SO_2	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Average Daily Emissions	0.242	12.51	13.73	0.005	0.022	0.017
Air District CEQA Thresholds	54	NA	54	NA	82	54
Exceeds Thresholds	No	NA	No	NA	No	No
Scenario/Tons per Year						
Annual Emissions	0.044	2.283	2.506	0.001	0.004	0.003
Air District CEQA Thresholds	10	NA	10	NA	15	10
Exceeds Thresholds	No	NA	No	NA	No	No

Note: Assumes the full buildout and data center is manned 365 days/year. This table does NOT include the emissions from the emergency engines. All source category include mobile worker travel, deliveries, energy use, fuel use, waste disposal, water use, and miscellaneous area sources.

Source: ADI CalEEMod analysis, July 2026, Sub-Appendix AQ4.

GHG Operations Emissions

A summary of GHG operational emissions is as follows:

- Miscellaneous Operations (area, energy, mobile, waste, water) = 1112 metric tons CO_2e/year
- Emergency Engines (Maintenance and Readiness Testing only) = 4,449 metric tons CO_2e/year

- Refrigerant leakage emissions = 811.2 metric tons CO_2e/year
- SF_6 Breaker emissions = 20.3 metric tons CO_2e/year
- 99 MW of energy use, 8,760 hours/year, PG&E Carbon Intensity Factor 206 pounds CO_2/MW-hour = 81,000.2 metric tons CO_2e/year[36]

Total CO_2e emissions from facility operations are: 6293 metric tons CO_2e/Year. This value is below the Air District significance level of 10,000 metric tons/year for operations of stationary sources.

Air Quality Impact Analysis

Modeling Overview

The evaluation of the potential air quality impacts and health risks were based on the estimate of the ambient air concentrations that could result from CABGF air emission sources. This section discusses the selection of the dispersion model, the data that was used in the dispersion model (pollutants modeled with appropriate averaging times, source characterization, building downwash, terrain, and meteorology), etc.

Assessments of ambient concentrations resulting from pollutant emissions (called air quality impacts) are typically conducted using EPA-approved air quality dispersion models. These models are based on mathematical descriptions of atmospheric diffusion and dispersion processes in which a pollutant source impact can be calculated over a given area and for a specific period of time (called averaging period). By using mathematical models, the assessment of emissions can be determined for both existing sources as well as future sources not yet in operation. Inputs required by most dispersion models, which must be specified by the user, include the following:

- Model options, such as averaging time to be calculated;
- Meteorological data, used by the model to estimate the dispersion conditions experience by the source emissions;
- Source data, such as source location and characteristics – stack emissions like those considered here are modeled as “point” sources, which require user inputs of the release height, exit temperature and velocity, and stack diameter (used by the dispersion model to estimate the mechanical and buoyant plume rise that will occur due to the release of emissions from a stack); and
- Receptor data, which are the location(s) of the given area where ambient concentrations are to be calculated by the dispersion model.

[36] Note: The emissions noted above (i.e., 81,000.2 metric tons CO_2e/year) are not emitted at the project facility. These emissions result from power generation across the PG&E system, and as such they are reported by PG&E on a specific generating facility basis. These emissions are not part of the project facility inventory. In addition, it should not be implied that “new” fossil fuel generation capacity will be required to be added to the PG&E system to supply the data center needs.

Model Selection

To estimate ambient air concentrations, the latest version of the AERMOD (Version 24142)[37] dispersion model was used. AERMOD is appropriate for use in estimating ground-level short-term ambient air concentrations resulting from non-reactive buoyant emissions from sources located in simple, intermediate, and complex terrain. AERMOD is the preferred guideline model recommended by EPA for these types of assessments and is based on conservative assumptions (i.e., the model tends to over-predict actual impacts by assuming steady state conditions, no pollutant loss through conservation of mass, no chemical reactions, etc.). AERMOD is capable of assessing impacts from a variety of source types such as point, area, line, and volume sources (as noted above, point source types are used to model stack sources like the CABGF engine emissions); downwash effects; gradual plume rise as a function of downwind distance; time-dependent exponential decay of pollutants; and can account for settling and dry deposition of particulates (all CABGF emissions were conservatively modeled as non-reactive gaseous emissions). The model is capable of estimating concentrations for a wide range of averaging times (from one hour to the entire period of meteorological data provided).

AERMOD calculates ambient concentrations in areas of simple terrain (receptor base elevations below the stack release heights), intermediate terrain (receptor base elevations between stack release and final plume height), and complex terrain (receptor base elevations above final plume height). AERMOD assesses these impacts for all meteorological conditions, including those that would limit the amount of final plume rise. Plume impaction on elevated terrain, such as on the slope of a nearby hill, can cause high ground level concentrations, especially under stable atmospheric conditions. Due to the relatively flat nature of the CABGF Project terrain area, including the surrounding properties, plume impaction effects would not be expected to occur. AERMOD also considers receptors located above the receptor base elevation, called flagpole receptors.

Another dispersion condition that can cause high ground level pollutant concentrations is caused by building downwash. Building downwash can occur during high wind speeds or a building or structure is in close proximity to the emission source. This can result in building wake effects where the plume is drawn down toward the ground by the lower pressure region that exists in the lee side (downwind) of the building or structure. This AERMOD feature was also used in modeling the CABGF emission sources as described later.

Model Input Options

Model options refer to user selections that account for conditions specific to the area being modeled or to the emissions source that needs to be examined. AERMOD also supplies recommended defaults for the user for other model options. This analysis was conducted using

[37] U.S. Environmental Protection Agency. *User's Guide for the AERMOD Dispersion Models, User's Guide to the Building Profile Input Program (Revised), EPA-454/B-24-007, Office of Air Quality Planning and Standards.* November 2024.

AERMOD in the regulatory default mode, which includes the following additional modeling control options:

- adjusting stack heights for stack-tip downwash,
- using upper-bound concentration estimates for sources influenced by building downwash from super-squat buildings,
- incorporating the effects of elevated terrain,
- employing the EPA-recommended calms processing routine, and
- employing the EPA-recommended missing data processing routine.

Calculation of chemical concentrations for use in the impact and exposure analysis requires the selection of appropriate concentration averaging times. Average pollutant concentrations ranging from one hour to annual based on the meteorological data were calculated for each CABGF source and the facility in total.

Site Urban/Rural Classification

The Land Use/Land Classification data from 2023 were analyzed within a three kilometer radius around the project site. The Land Use/Land Classification data shows that within the three kilometer radius around the Project Site, the region can be characterized as urban, made up largely of commercial, industrial, transportation and mid to high density residential. Figure AQ3-1 in Sub-Appendix AQ3 presents the results of this analysis. In accordance with the Auer land use classification methodology (EPA's "Guideline on Air Quality Models"), land use within the area circumscribed by a three kilometer radius around the facility is greater than 50 percent urban. Therefore, in the AERMOD modeling analyses, urban coefficients were assigned.

The 2022 AERMOD Implementation Guide provides the following recommendations for assigning an urban population number in AERMOD.

> For urban areas adjacent to or near other urban areas, or part of urban corridors, the user should attempt to identify that part of the urban area that will contribute to the urban heat island plume affecting the source(s). If this approach results in the identification of clearly defined MSAs, then census data may be used as above to determine the appropriate population for input to AERMOD. Use of population based on the Consolidated MSA (CMSA) for applications within urban corridors is not recommended, since this may tend to overstate the urban heat island effect. Similarly, for application sites that are in isolated areas of dense population but are not representative of the larger MSA, care should be taken to determine the extent of the urban area that will contribute to the urban heat island plume affecting the source(s).
>
> For situations where MSAs cannot be clearly identified, the user may determine the extent of the area, including the source(s) of interest, where the population density exceeds 750

people per square kilometer. The combined population within this identified area may then be used for input to the AERMOD model.

Dispersion within urban environments has different characteristics than that occurring in a rural environment. The urban boundary layer will behave in a more convective, turbulent manner during the hours just after sunset due to the urban heat island effect.

Using the Project site as general center point, the Santa Clara 2020 census areas were used to establish the urban population values as inputs into AERMOD. A population of 1,837,446 persons was used for this area of Santa Clara County. Based on the population of 1,837,446, this value was used for the population input into AERMOD. This combined population would present a conservative and appropriate magnitude of the urban heat island effects within the impact areas surrounding both sites.

Meteorological Data – Modeling Inputs

AERMOD requires a meteorological input file to characterize the transport and dispersion of pollutants in the atmosphere. Surface and upper air meteorological data inputs, along with surface parameter data describing the land use and surface characteristics near a site, are used as inputs into the AERMET meteorological preprocessor. The output files generated by AERMET consist of the surface and upper air meteorological input files required by AERMOD.

AERMOD uses hourly meteorological data to characterize plume dispersion. AERMOD calculates the dispersion conditions for each hour of meteorological data for the emission sources modeled at the user-specific receptor locations. The resulting one-hour impacts are then averaged by AERMOD for the averaging time(s) specified by the user (accounting for calm winds and missing meteorological data as specified in the model options). Meteorological data from the San Jose International Airport were provided by the Air District for the five years of 2013 through 2017, inclusive. The representativeness of the meteorological data is dependent on the proximity of the meteorological monitoring site to the area under consideration; the complexity of the terrain, the exposure of the meteorological monitoring site, and the period of time during which the data are collected. The data was collected approximately three kilometers from the eastern edge of the CABGF project boundary and were provided by Air District as the most appropriate meteorological data for this modeling analysis. The data were processed by Air District with AERMET (version 18081), AERMOD's meteorological data preprocessor module.

The San José International Airport meteorological data consists of surface measurements including wind speed, wind direction, temperature, and solar radiation, which were combined with National Weather Service upper air data from the Oakland International Airport. The EPA-recommended 90 percent completeness criteria are met for all modeled parameters in the Air District meteorological data. A 5-year annual wind rose is provided in Appendix AQ3.

Building Downwash and Receptors – Modeling Inputs

The effects of building downwash on facility emissions were included in the modeling assessment. The Plume Rise Model Enhancements to the EPA Building Profile Input Program (BPIP-PRIME, version 04274) was used to determine the direction-specific building downwash parameters. The PRIME enhancements in AERMOD calculate fields of turbulence intensity, wind speed, and slopes of the mean streamlines as a function of projected building shape. Using a numerical plume rise model, the PRIME enhancements in AERMOD determine the change in plume centerline location and the rate of plume dispersion with downwind distance. Concentrations are then predicted by AERMOD in both the near and far wake regions, with the plume mass captured by the near wake treated separately from the uncaptured primary plume and re-emitted to the far wake as a volume source. Figure AQ3-2 in Sub-Appendix AQ3 presents the building data used in the downwash analysis.

Receptor grids were generated along the fence line (≤10 meter spacing), from the fence line to 300 meters (20-meter spacing), from 300 meters to one kilometer (km) (50-meter spacing), from 1.0 to 5.0 km (200-meter spacing). If any of the maximum impacts occurred on receptors with spacing greater than 20 meters, a refined grid with 20-meter resolution would be created and extended outwards by 500 meters in all directions. All receptor and source locations are referenced in meters using the Universal Transverse Mercator (UTM) Cartesian coordinate system based on the North American Datum of 1983 (NAD83) for Zone 10.

The latest version of AERMAP (version 24142) was used to determine receptor elevations and hill-slope factors utilizing USGS's 1-degree square National Elevation Dataset (NED). NED spacings were approximately 10 meters for the fence line, 20-meter, 50-meter, and 100-meter spaced receptor grids and one degree arclength (approximately 30 meters) for 200-meter and 500-meter spaced receptor grids and sensitive receptors. Electronic copies of the BPIP-PRIME and AERMAP input and output files, including the NED data, are included with the application will be submitted to Staff electronically. Figure AQ3-3 in Sub-Appendix AQ3 presents the receptor grids used in the modeling analyses.

Source Data – Modeling Inputs

Emissions and stack parameters for the 44 Caterpillar diesel engines are presented in Sub-Appendix AQ-1 and AQ-3 and were used to develop the modeling inputs. Stack parameters (e.g., stack height, exit temperature, stack diameter, and stack exit velocity) were based on the parameters given by the engine manufacturer and the Applicant. Stack locations for the proposed sources were matched to show their actual location based on the proposed facility plot plan. Sub-Appendix AQ-3 presents the locations of the CABGF sources, and the building outlines considered in the downwash analysis. Stack base elevations were given a common base elevation based on the range of elevations calculated with AERMAP for the stack locations.

Impact Analysis Summary

Operation

Operational characteristics of the diesel engines, such as emission rate, exit velocity, and exit temperature, vary by operating loads. The engines could be operated over a range of load conditions from 10 to 100 percent. To determine the maximum for the short-term hourly average impacts, a screening analysis was prepared for the engine loads from 10, 25, 50, 75 and 100 percent. The results of the load screening assessment identified that the 100 percent load case always produced the highest ground level concentrations. From the load screening, the 100 percent load stack parameters and emission rates were used for each of the proposed 44 engines. Each engine was assigned its own source group to identify which engine location would produce the largest ground level concentrations for the 1-hour, 8-hour, and 24-hour averaging periods. The engines were assumed to be tested anytime from 7:00 AM to 5:00 PM (controlled using the EMISFACT/HROFDY model option). Although the engines will typically only be tested individually for up to one hour at any one time, each engine was assumed to operate up to eight hours/day (7:00 AM to 5:00 PM) to conservatively represent eight different engines operating one hour each in any one day for 3-hour, 8-hour, and 24-hour averaging times. Thus, using the worst-case stack condition, the worst-case engine location could be determined from the screening analysis. All 44 engines were assumed to be tested for annual averages, with emissions proportioned accordingly. The screening results are presented in Sub-Appendix AQ-3.

Based on the results of the screening analyses, all CABGF sources were modeled in the refined analyses for comparisons with the annual CAAQS and NAAQS and the short-term NAAQS with multi-year statistical forms (1-hour NO_2 and SO_2 and 24-hour $PM_{2.5}$ and PM_{10}). Impacts during normal testing operations were based on the worst-case engine location, taken from the engine screening analyses which were used to identify the worst-case location. Since the engines will each be tested less than or equal to 50 hours/year, the annual average emission rate was converted into a 1-hour NO_2 and SO_2 emission rate for the NAAQS modeling analyses. For the CAAQS, the maximum hourly emission rates were used for the short term standards.

For the 1-hour NO_2 modeling assessments, the Ambient Ratio Method Version 2 (ARM2) was used in the modeling analyses with an in-stack NO_2/NO_x ratio of 0.5 (50 percent) based on EPA Guideline requirements. This is conservative as the NO_2/NO_x ratios for these types of engines are typically around 10 percent, as per the EPA's ISR database.

The highest NO_2 background data over the last three years from the 158 East Jackson Street monitoring site was used to assess the CAAQS, which was then added to the modeled NO_2 concentration for the 1-hour CAAQS assessment. The three-year average of the second-highest hourly value for the same three year period were added to the modeled NO_2 concentration for the NAAQS assessment. Assessment with the CAAQS is based on the maximum 1-hour NO_2 concentration with background added. NO_2 NAAQS compliance based on the five-year average of the 98th percentile daily maximum annual 1-hour impacts with background concentration added.

Based on the results of the modeling analyses, the operational modeled concentrations are presented in Table 4.3-17. Note that the annual maximum $PM_{2.5}$ concentration is less than the significance impact level (SIL) of 0.13 ug/m^3. Therefore, the Project will not cause or contribute to any exceedances of the annual $PM_{2.5}$ standard.

Table 4.3-17: Modeled Operational Concentrations and Ambient Air Quality Standards

Pollutant	Averaging Period	Maximum Concentration (µg/m^3)	Background (µg/m^3)	Total (µg/m^3)	Ambient Air Quality Standards (µg/m^3)	
					CAAQS	NAAQS
3-/8-/24-Hour Maxima shown for one engine operating up to 10 hours/day (7AM-5PM)						
NO_2*	1-hour maximum (CAAQS)	115	111	226	339	-
	3-year average of 1-hour yearly 98th percentile (NAAQS)**	2.2	78.5	80.7	-	188
	Annual maximum	6.6	17.8	24.4	57	100
CO	1-hour maximum	239	2176	2415	23,000	40,000
	8-hour maximum	111	1603	1714	10,000	10,000
SO_2	1-hour maximum (CAAQS)	0.5	93.4	93.9	655	-
	3-year average of 1-hour yearly 99th percentile (NAAQS)**	0.01	7.9	7.9	-	196
	24-hour maximum	0.1	5	5.1	105	365
	Annual maximum	0.01	0.6	0.6	-	80
PM_{10}	24-hour maximum (CAAQS)	0.2	53	53.2	50	-
	24-hour 4th highest over 5 years (NAAQS)	0.2	48	48.2	-	150
	Annual maximum (CAAQS)	0.1	24.8	24.9	20	-
$PM_{2.5}$	3-year average of 24-hour yearly 98th percentile	0.2	26	26.2	-	35
	Annual maximum (CAAQS)	0.05	10.1	10.2	9.0	-
	3-year average of annual concentrations (NAAQS)	0.05	9.2	9.3	-	9.0

*1-hour NO_2 impacts evaluated with Ambien Ratio Method #2 (ARM2), with the maximum hourly background added in separately. Annual NO_2 impacts evaluated with ARM2. Modeling utilized USEPA-default minimum/maximum NO_2/NOx ambient ratios of 0.5/0.9.

** Impacts for the 1-hour statistical-based NO_2 and SO_2 NAAQS are based on the annual average emissions per USEPA guidance documents for intermittent sources like emergency generators. Impacts for the 1-hour NO_2 and SO_2 CAAQS are based on the 1-hour emission rate since these CAAQS are "values that are not to be exceeded".

Construction

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. These exhaust air pollutant emissions would not be considered to contribute substantially to existing or projected air quality violations. Construction exhaust emissions may still pose health risks for sensitive receptors such as nearby residents. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors. A health risk assessment of the project construction activities was conducted that evaluated potential health effects of sensitive receptors at these nearby residences from construction emissions of DPM and $PM_{2.5}$. The closest residential sensitive receptors to the project site are located beyond 1000 feet, west, southwest, and east-southeast of the project boundary. Emissions and dispersion modeling were conducted to predict the off-site concentrations resulting from project construction, so that lifetime cancer risks and non-cancer health effects could be evaluated.

In addition, during excavation, grading, and some building construction activities, substantial amounts of dust could be generated. Most of the dust would result during grading activities. The amount of dust generated would be highly variable and would be dependent on the size of the area disturbed at any given time, amount of activity, soil conditions, and meteorological conditions. To address fugitive dust emissions that lead to elevated PM_{10} and $PM_{2.5}$ levels near construction sites, the Air District CEQA Air Quality Guidelines identify BMPs. Once these BMPs are included in construction projects, these impacts will be considered less than significant. In addition, diesel emissions from construction related equipment will temporarily result in an increase in health risk to nearby offsite receptors.

For modeling fugitive PM_{10} and $PM_{2.5}$ emissions, a near-ground level release height of 0.5 meters (1.6 feet) was used for the area source. Emissions from the construction equipment and on-road vehicle travel were distributed throughout the modeled area source. To represent the construction equipment exhaust emissions, 117 equally spaced (20 meter) point sources were placed within the area of construction activity. Each point source had an emission release height of 3.05 meters (10 feet). The exit temperature and stack velocity were based on an average sized construction engine that could be used for the Project. Two construction emission scenarios were modeled: 1: A single shift occurring daily between 7:00 AM to 5:00 PM and 2: a double shift where two 8- hour periods were modeled between 8:00 AM to 4:00 PM and then 8:00 PM to 4:00 AM the following day. Figure AQ4-1 in Sub-Appendix AQ4 presents the source and fugitive dust sources that were included in AERMOD. The modeling results for the single shift construction schedule is presented in Table 4.3-18 with the double shift modeling results presented in Table 4.3-19.

Table 4.3-18: Modeled Construction Concentrations and Ambient Air Quality Standards (Single Shift)

Pollutant	Averaging Period	Maximum Concentration (µg/m³)	Background (µg/m³)	Total (µg/m³)	Ambient Air Quality Standards (µg/m³)	
					CAAQS	NAAQS
Construction occurs for up to 10 hours per day (7:00 AM-5:00 PM)						
NO_2*	1-hour maximum (CAAQS)	6.94	111.0	117.9	339	-
	3-year average of 1-hour yearly 98th percentile (NAAQS)	3.81	78.5	82.3	-	188
	Annual maximum	0.79	17.8	18.6	57	100
CO	1-hour maximum	25.11	2,176	2,201.1	23,000	40,000
	8-hour maximum	13.43	1,603	1,616.4	10,000	10,000
SO_2	1-hour maximum (CAAQS)	0.0397	93.4	93.5	655	-
	3-year average of 1-hour yearly 99th percentile (NAAQS)	0.0390	7.9	7.9	-	196
	24-hour maximum	0.0082	5	5.0	105	365
	Annual maximum	0.0041	0.6	0.6	-	80
PM_{10}	24-hour maximum (CAAQS)	1.44	53	54.4	50	-
	24-hour H6H (NAAQS)	1.23	48	49.2	-	150
	Annual maximum (CAAQS)	0.67	24.8	25.5	20	-
$PM_{2.5}$	3-year average of 24-hour yearly 98th percentile	0.024	26	26.0	-	35
	Annual maximum (CAAQS)	0.018	10.1	10.1	9.0	-
	3-year average of annual concentrations (NAAQS)	0.016	9.2	9.2	-	9.0

*1-hour NO_2 impacts evaluated with Ambien Ratio Method #2 (ARM2), with the maximum hourly background added in separately. Annual NO_2 impacts evaluated with ARM2. Modeling utilized EPA-default minimum/maximum NO_2/NO_x ambient ratios of 0.5/0.9.

1 - Maximum 8th-highest max daily 1-hr results averaged over 5 years
2 - Maximum 4th-highest
3 - Maximum 8th-highest 24-hr results averaged over 5 years
4 - Maximum annual results averaged over 5 years

Table 4.3-19: Modeled Construction Concentrations and Ambient Air Quality Standards (Double Shift)

Pollutant	Averaging Period	Maximum Concentration (µg/m³)	Background (µg/m³)	Total (µg/m³)	Ambient Air Quality Standards (µg/m³)	
					CAAQS	NAAQS
Construction occurs for up to 10 hours per day (7:00 AM-5:00 PM)						
NO_2*	1-hour maximum (CAAQS)	8.16	111	119.2	339	-
	3-year average of 1-hour yearly 98th percentile (NAAQS)	7.54	78.5	86.0	-	188
	Annual maximum	1.07	17.8	18.9	57	100
CO	1-hour maximum	22.86	2,176	2,198.9	23,000	40,000
	8-hour maximum	11.07	1,603	1,614.1	10,000	10,000
SO_2	1-hour maximum (CAAQS)	0.0362	93.4	93.4	655	-
	3-year average of 1-hour yearly 99th percentile (NAAQS)	0.0359	7.9	7.9	-	196
	24-hour maximum	0.0154	5	5.0	105	365
	Annual maximum	0.0044	0.6	0.6	-	80
PM_{10}	24-hour maximum (CAAQS)	2.22	53	55.2	50	-
	24-hour H6H (NAAQS)	2.08	48	50.1	-	150
	Annual maximum (CAAQS)	0.96	24.8	25.8	20	-
$PM_{2.5}$	3-year average of 24-hour yearly 98th percentile	0.042	26	26.0	-	35
	Annual maximum (CAAQS)	0.023	10.1	10.1	9.0	-
	3-year average of annual concentrations (NAAQS)	0.021	9.2	9.2	-	9.0

*1-hour NO_2 impacts evaluated with Ambien Ratio Method #2 (ARM2), with the maximum hourly background added in separately. Annual NO_2 impacts evaluated with ARM2. Modeling utilized EPA-default minimum/maximum NO_2/NOx ambient ratios of 0.5/0.9.

1 - Maximum 8th-highest max daily 1-hr results averaged over 5 years
2 - Maximum 4th-highest
3 - Maximum 8th-highest 24-hr results averaged over 5 years
4 - Maximum annual results averaged over 5 years

Based on the modeling results in Table 4.3-17, Table 4.3-18, and Table 4.3-19, the only modeled concentrations plus background concentrations greater than the standards are for the $PM_{2.5}$ CAAQS and NAAQS. These exceedances are due to the background concentrations which already exceed the standards. Modeled project impacts in these instances are less than the EPA and/or Bay Area

Air District significance levels and thus, the project will not cause or contribute to an exceedance of any air quality standard for any averaging time period. The project will therefore comply with the CAAQS and NAAQS.

Public Health and Health Risk Assessment

This section presents the methodology and results of a human health risk assessment performed to assess potential impacts and public exposure associated with airborne emissions from the routine operation of the Project.

Air will be the dominant pathway for public exposure to chemical substances released by the Project. Emissions to the air will consist primarily of combustion byproducts produced by the diesel-fired emergency standby engines. Potential health risks from combustion emissions will occur almost entirely by direct inhalation. To be conservative, additional pathways were included in the health risk modeling; however, direct inhalation is considered the most likely exposure pathway. The risk assessment was conducted in accordance with guidance established by the California Office of Environmental Health Hazard Assessment and CARB.[38]

Combustion byproducts with established CAAQS or NAAQS, including NOx, CO, SO2 and PM_{10}/$PM_{2.5}$ were addressed in the previous Air Quality Section.

Affected Environment

Sensitive receptors are defined as groups of individuals that may be more susceptible to health risks due to chemical exposure. Schools (public and private), day care facilities, convalescent homes, and hospitals are of particular concern. The nearest sensitive receptors, by type, are listed in Table 4.3-20. There are no sensitive receptors within 1,000 feet of the facility boundary. Sub-Appendix AQ5 contains support materials for the facility health risk assessment, including a listing of sensitive receptors within a two-mile radius area. HAPs emissions evaluations are presented in Sub-Appendix AQ1.

The receptors noted below should not be assumed to represent the maximum impact locations based on receptor type. For example, the nearest residence noted in the table may not be the maximum impacted residence on the modeling grid.

[38] ADMRT, Air Dispersion Modeling and Risk Tool, HARP2, Ver. 22118, CARB, April 28, 2022.

Table 4.3-20: Sensitive Receptors Nearfield of the CABGF Site

Receptor Type	UTM Coordinates	Distance from Site (Approximate feet)
Nearest Residences (East)	597517.15, 4137619.30	4500
Nearest Hospital	None	N/A
Nearest School (Any type)	597151.85, 4138569.55	4200
Nearest Daycare	597183.49, 4138634.53	4800
Nearest Convalescent Home	None	N/A
Nearest College/University	595988.93, 4136180.47	4800

Source: Google Earth Image 10/2025. All coordinates are approximate.

The Air District monitors and manages Toxic Air Contaminants (TACs) through its Air Toxics Control Program.

Over the last several decades, ambient levels and overall emissions of key air toxics in the San Francisco Bay Area have decreased significantly. This downward trend is primarily attributed to stringent state and local mobile source regulations (such as California Air Resources Board cleaner fuel and diesel rules) alongside regional stationary source permitting and control measures.

The key components of the District's toxics program are:

- Facility Risk Reduction Programs
- Evaluating Air Toxics in Permitting
- Control Measure Implementation
- Emissions Tracking
- Air Toxics Ambient Air Monitoring
- Community Health Protection Initiatives

While hundreds of compounds are tracked, Air District data shows that a small group of pollutants drives more than 90 percent of the cumulative health and cancer risk:

- Diesel Particulate Matter (DPM): Consistently the dominant driver of airborne toxic risk in the region, primarily originating from mobile sources (trucks, buses, marine vessels, and trains).
- Gaseous Toxics: Benzene, 1,3-butadiene, formaldehyde, acetaldehyde, and acrolein make up the bulk of the remaining risk, originating from both industrial facilities and gasoline-powered vehicles.
- Trace Metals: Metals like Hexavalent Chromium, Nickel, Cadmium, and Lead carry high unit toxicities, but occur in much lower atmospheric concentrations.

In recent years, the regulatory focus has shifted from macro-regional trends to identifying localized "hot spots" and reducing exposure disparities in overburdened communities (driven by programs like AB 617 and Air District's Regulation 11, Rule 18 for existing facilities).

- 2024–2025 Air Toxics Reports: Under recent legal and environmental justice agreements, the Air District released updated annual Toxic Air Contaminant Program reports coupled with an interactive web mapping asset: the Facility Toxic Emissions and Prioritization Tool.[39]
- Localized Tracking: This system categorizes nearly 10,000 permitted commercial and industrial facilities into High, Intermediate, or Low priority rankings based on their local emission scores, driving targeted Health Risk Assessments (HRAs) for facility-level risk reduction.
- Data Notes: While point-source industrial emissions fluctuate year-to-year based on facility throughput, fuel mixes, and control technology upgrades, the overall regional trend emphasizes aggressive mitigation at localized stationary facilities to complement state-level mobile diesel combustion reductions.

Environmental Consequences

Cancer Risk

Cancer risk is the probability or chance of contracting cancer over a period of time normally defined as either 30 or 70-years depending on the project type and agency risk procedures. Carcinogens are not assumed to have a threshold below which there would be no human health impact. In other words, any exposure to a carcinogen is assumed to have some probability of causing cancer; the lower the exposure, the lower the cancer risk (i.e., a linear, no-threshold model). Under various state and local regulations, an incremental cancer risk greater than 10-in-one million due to a project is considered to be a significant impact on public health. For example, the 10-in-one-million risk level is used by the Air Toxics Hot Spots (AB 2588) program and California's Proposition 65 as the public notification level for air toxic emissions from existing sources.

Non-Cancer Risk

Non-cancer health effects can be either chronic or acute. In determining potential non-cancer health risks (chronic and acute) from air toxics, it is assumed there is a dose of the chemical of concern below which there would be no impact on human health. The air concentration corresponding to this dose is called the Reference Exposure Level (REL). Non-cancer health risks are measured in terms of a hazard quotient, which is the calculated exposure of each contaminant divided by its REL. Hazard quotients for pollutants affecting the same target organ are typically summed with the resulting totals expressed as hazard indices for each organ system. A hazard index of less than 1.0 is considered to be an insignificant health risk. For this health risk assessment, all

[39] Bay Area Air District. Toxic Air Contaminant Control Programs Annual Report 2026. April 2, 2026. https://www.baaqmd.gov/~/media/files/engineering/air-toxics-annual-report/2026/tac-control-program-annual-report-2026-pdf.pdf?rev=46329ab27a8d4af6998d0ddf20e82256&sc_lang=en.

hazard quotients were summed regardless of target organ. This method leads to a conservative (upper bound) assessment. RELs used in the hazard index calculations were those published in the Consolidated CARB/OEHHA listings dated September 2025.

Chronic toxicity is defined as adverse health effects from prolonged chemical exposure, caused by chemicals accumulating in the body. Because chemical accumulation to toxic levels typically occurs slowly, symptoms of chronic effects usually do not appear until long after exposure commences. The lowest no-effect chronic exposure level for a non-carcinogenic air toxic is the chronic REL. Below this threshold, the body is capable of eliminating or detoxifying the chemical rapidly enough to prevent its accumulation. The chronic hazard index was calculated using the hazard quotients calculated with annual concentrations.

Acute toxicity is defined as adverse health effects caused by a brief chemical exposure of no more than 24 hours. For most chemicals, the air concentration required to produce acute effects is higher than the level required to produce chronic effects because the duration of exposure is shorter. Because acute toxicity is predominantly manifested in the upper respiratory system at threshold exposures, all hazard quotients are typically summed to calculate the acute hazard index. One-hour average concentrations are divided by acute RELs to obtain a hazard index for health effects caused by relatively high, short-term exposure to air toxics. Since this assessment considers only DPM, and DPM has no acute REL, acute HI values were not calculated. The following receptor descriptors are used herein:

- Point of maximum impact (PMI) – this receptor represents the highest concentration and risk point on the receptor grid for the analysis under consideration.
- Maximum exposed individual residential receptor (MEIR) – this receptor represents the maximum impacted actual residential location on the grid for the analysis under consideration.
- Maximum exposed individual worker receptor (MEIW) – this receptor represents the maximum impacted actual worker location on the grid for the analysis under consideration.
- Maximum exposed individual sensitive receptor (MEIS) – this receptor represents the maximum impacted actual sensitive location on the grid for the analysis under consideration. This location is a non-residential sensitive receptor (i.e., school, hospital, daycare center, convalescent home, etc.).

Construction and Operational Phase Impacts

Environmental consequences potentially associated with the project are potential human exposure to chemical substances emitted into the air. The human health risks potentially associated with these chemical substances were evaluated in a health risk assessment. The chemical substance potentially emitted to the air from the proposed facility is DPM. DPM is the approved surrogate compound for diesel fuel combustion pursuant to CARB and EPA.

Emissions of criteria pollutants will adhere to NAAQS or CAAQS as discussed in the Ambient Air Quality section. The proposed facility emergency electrical backup engines will be either certified or compliant Tier 4 units and as such, they meet the BACT requirements of the Air District. These engines are equipped with DPFs. Finally, air dispersion modeling results show that emissions will not result in concentrations of criteria pollutants in air that exceed ambient air quality standards (either NAAQS or CAAQS). These standards are intended to protect the general public with a wide margin of safety. Therefore, the Project is not anticipated to have a significant impact on public health from emissions of criteria pollutants.

Potential impacts associated with emissions of toxic pollutants to the air from the proposed facility were addressed in a health risk assessment, with support data presented in Appendix AQ5. The risk assessment was prepared using guidelines developed by OEHHA and CARB, as implemented in the latest version of the HARP model (ADMRT40 Version 22118). The Air District health database option in HARP was used for all analyses.

Public Health Impact Study Methods

Emissions of TACs potentially associated with the facility were estimated using emission factors for PM_{10} as DPM derived from the following:

- Caterpillar 3516E HPD Engines (42 sources):
    - Each large engine running for 50 hours per year for Maintenance and Readiness operations, at 100 percent load, using composite emissions factors to address both uncontrolled and controlled emissions during such testing.

- Caterpillar 3512C Engine (2 sources):
    - Each small engine running for 50 hours per year for Maintenance and Readiness operations, at 100 percent load, using composite emissions factors to address both uncontrolled and controlled emissions during such testing.

TACs from fuel storage emissions were not included as the level of emissions are insignificant. The emissions from the diesel fuel storage tanks are often well below the HRA acute and chronic mass emissions thresholds in Air District Regulation 2 Rule 5.

There were no identified TACs associated with the data center chiller systems emissions or the use of the insulation gas in the substation breakers.

Concentrations of these pollutants in air potentially associated with the emissions were estimated using dispersion modeling as discussed in the Air Quality section. Modeling allows the estimation of both short-term and long-term average concentrations in air for use in a risk assessment,

[40] ADMRT, Air Dispersion Modeling and Risk Tool, HARP2, Ver. 22118, CARB, April 28, 2022.

accounting for site-specific terrain and meteorological conditions. Health risks potentially associated with the estimated concentrations of pollutants in air were characterized in terms of excess lifetime cancer risks, or comparison with reference exposure levels for non-cancer health effects.

Health risks potentially associated with concentrations of carcinogenic pollutants in air were calculated as estimated excess lifetime cancer risks. The excess lifetime cancer risk for a pollutant is estimated as the product of the concentration in air and a unit risk value. The unit risk value is defined as the estimated probability of a person contracting cancer as a result of constant exposure to an ambient concentration of 1 μg/m^3 over a 30-year lifetime. In other words, it represents the increased cancer risk associated with continuous exposure to a concentration in air over a pre-defined period (i.e., usually a 30-year lifetime). Evaluation of potential non-cancer health effects from exposure to short-term and long-term concentrations in air was performed by comparing modeled concentrations in air with the RELs. An REL is a concentration in air at or below which no adverse health effects are anticipated. RELs are based on the most sensitive adverse effects reported in the medical and toxicological literature. Potential non-cancer effects were evaluated by calculating a ratio of the modeled concentration in air and the REL. This ratio is referred to as a hazard quotient. The unit risk values and RELs used to characterize health risks associated with modeled concentrations in air were obtained from the Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values[41] and are presented in Table 4.3-21.

Table 4.3-21: Toxicity Values Used to Characterize Health Risks

TAC	Unit Risk Factor (μg/m3)-1	Chronic Reference Exposure Level (μg/m3)	Acute Reference Exposure Level (μg/m3)
DPM	0.0003	5	--

Source: California Air Resources Board. "Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values." September 2025.
https://ww2.arb.ca.gov/sites/default/files/classic/toxics/healthval/contable09252025.pdf

Table 4.3-22 delineates the maximum hourly and annual emissions of the identified air toxic pollutants (DPM) from the emergency backup engines.

[41] California Air Resources Board. "Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values." August 2025. https://ww2.arb.ca.gov/sites/default/files/classic/toxics/healthval/contable09252025.pdf

Table 4.3-22: Maximum CABGF Hourly, Daily, and Annual Air Toxic Emissions (Per Engine Basis)

Engine Model	Toxic	Max Hour Emissions, Lbs	Max Daily Emissions, Lbs	Max Annual Emissions Lbs
CAT C175	DPM	0.174	-	8.70
CAR 3512C	DPM	0.088	-	4.40

Note: Engines are equipped with diesel particulate filters at <= 0.018 g/bhp-hour

Annual emissions are based on the Maintenance and Readiness Testing scenario.

Construction Phase Impacts

The proposed Project would be a source of air pollutant emissions during Project construction. The Air District CEQA Air Quality Guidelines considers exposure of sensitive receptors to air pollutant levels that result in an unacceptable cancer risk or hazard to be significant. Air District recommends a 1,000-foot zone of influence around project boundaries. Results of the construction related health risk assessment in Table 4.3-23 indicate that the risk values from the single shift construction schedule would be less than the established threshold the Air District considers significant.

Table 4.3-23: CADC/CABGF Construction Health Risk Assessment Summary (Single Shift)

Location	Receptor #	UTM (meters)	Cancer Risk	Chronic HI	Acute HI	Cancer Burden
PMI	1456	596200.0 4137600.0	2.57×10^{-6}	0.00177	-	NA
MEIR	6020	597700.0 4137500.0	1.45×10^{-8}	0.00005	-	NA
MEIS	4255	597200.0 4138500.0	8.72×10^{-9}	0.000006	-	NA
MEIW	1500	596220.0 4137580.0	1.55×10^{-7}	0.00172	-	NA

Note: PMI = point of maximum impact; MEIR = maximum exposed individual residential receptor; MEIW = maximum exposed individual worker receptor; MEIS = maximum exposed individual sensitive receptor

The PMI noted above is located at the southeast fence line.

DPM is the surrogate compound for construction equipment diesel exhaust. No acute REL has been established for DPM.

22 month construction period (HRA used 2 years as a conservative exposure period.)

FAH=1 for all age groups from 3rd trimester to 16 years, for MEIR and MEIS.

FAH not used for MEIW.

MEIS – Orchard Elementary School

Results of the construction related health risk assessment in Table 4.3-24 indicate that the risk values from the double shift construction schedule would also be less than what the Bay Area Air

District considers significant. Note that the PMI does exceed the 10 in a million risk threshold, but when adjusted to reflect worker exposure based upon its location, the risk is reduced to a less than significant impact.

Table 4.3-24: CADC/CABGF Construction Health Risk Assessment Summary (Double Shift)

Location	Receptor #	UTM (meters)	Cancer Risk	Chronic HI	Acute HI	Cancer Burden
PMI	1455	596200.0 4137580.0	1.49×10^{-5}	0.0102	-	NA
MEIR	6020	597700.0 4137500.0	5.44×10^{-7}	0.000374	-	NA
MEIS	4255	597200.0 4138500.0	3.66×10^{-7}	0.000252	-	NA
MEIW	1500	596220.0 4137580.0	9.23×10^{-7}	0.0102	-	NA

Note: PMI = point of maximum impact; MEIR = maximum exposed individual residential receptor; MEIW = maximum exposed individual worker receptor; MEIS = maximum exposed individual sensitive receptor

The PMI noted above is located just past the southeast fence line.

DPM is the surrogate compound for construction equipment diesel exhaust. No acute REL has been established for DPM.

17 month construction period (HRA used 2 years as a conservative exposure period.)

FAH=1 for all age groups from 3rd trimester to 16 years, for MEIR and MEIS.

FAH not used for MEIW.

MEIS – Orchard Elementary School

These values are below the Air District's significance thresholds for construction health risk impacts, and as such the community risk impacts from construction activities would be less than significant.

Characterization of Risks from Operational Toxic Air Pollutants

The excess lifetime cancer risk associated with operational concentrations in air estimated for the maximum CABGF sensitive receptor location is calculated to be 4.16×10^{-7} or 0.42 per million which is located east-southeast of the project fence line. Note that the PMI for operational impacts does exceed the 10 in a million risk threshold, but this location is not a sensitive receptor. When adjusted to reflect worker exposure based upon its location, the risk is reduced to a less than significant impact.

Excess lifetime cancer risks less than 10×10^{-6} (10 in a million) for sources with T-BACT, are unlikely to represent significant public health impacts that require additional controls of facility emissions. Risks higher than 1×10^{-6} may or may not be of concern, depending upon several factors. These include the conservatism of assumptions used in risk estimation, size of the potentially exposed population and toxicity of the risk-driving chemicals.

Health effects risk thresholds are listed on Table 4.3-25. Risks associated with pollutants potentially emitted from the facility are presented in Table 4.3-26 (operations-sensitive receptors) and Table 4.3-27 (operations-worker receptors). For the worker risk assessment, the Tier 1 worker adjustment factor (WAF) was set to 4.2 to account for the non-continuous testing schedule for the engines, as outlined in the 2016 Air Toxics Hot Spots Program Guidance Manual. The recommended Tier 1 activity rate of moderate intensity was also utilized. The results indicated that 9.43 x 10^{-6} cancer risk at the maximum worker location does not exceed the 10 x 10^{-6} significance level.

The chronic hazard indices for all scenarios are well below 1.0. It should be noted that DPM does not currently have an acute hazard index value, and as such, acute health effects were not evaluated in the HRA. Further description of the methodology used to calculate health risks associated with emissions to the air can be found in the March 2015 ADMRT Users Manual. As described previously, human health risks associated with emissions from the proposed facility are unlikely to be higher at any other location than at the location of the PMI. However, the location of the PMI is on the project fence line, adjacent to an existing parking lot and does not reflect the potential impact at any of the sensitive receptors, all of which have risks less than 10 x 10^{-06} or 10 in a million.

Table 4.3-25: Health Risk Significance Thresholds

Risk Category	Air District Project Risk	Air District Net Project Risk
Cancer Risk	10 x 10^{-6}	10 x 10^{-6}
Cancer Risk (Overburdened Community)	6 x 10^{-6}	6 x 10^{-6}
Chronic Hazard Index	1.0	1.0
Acute Hazard Index	1.0	1.0
Cancer (T-BACT required)	>1 in a million Chronic HI > 0.20	>1 in a million Chronic HI > 0.20
Cancer Burden	NA	NA

Source: Regulation 2 Rule 5, NSR for Toxic Air Contaminants

Table 4.3-26: Operational CADC/CABGF Residential/Sensitive Health Risk Assessment Summary

Location	Receptor #	UTM (meters)	Cancer Risk	Chronic HI	Acute HI	Cancer Burden
PMI	1499	596220.0 4137560.0	3.69×10^{-5}	0.00994	-	NA
MEIR	6020	597700.0 4137500.0	4.16×10^{-7}	0.000112	-	NA
MEIS	4207	597150.0 4138550.0	2.08×10^{-7}	0.000054	-	NA

Note: PMI = point of maximum impact; MEIR = maximum exposed individual residential receptor; MEIS = maximum exposed individual sensitive receptor

The PMI noted above is located just past the southeast fence line.

FAH=1 for all age groups from 3rd trimester to 16 years, for MEIR and MEIS.

FAH not used for MEIW.

MEIS – Orchard Elementary School

Table 4.3-27: Operational CADC/CABGF Worker Health Risk Assessment Summary

Location	Receptor #	UTM	Cancer Risk	Chronic HI	Acute HI	Cancer Burden
PMI	1499	596220.0 4137560.0	9.43×10^{-6}	0.00994	-	NA
MEIW	1499	596220.0 4137560.0	9.43×10^{-6}	0.00994	-	NA

Note: PMI = point of maximum impact; MEIW = maximum exposed individual worker receptor

The PMI noted above is located past the southeast fence line at the same location as the MEIW.

Cancer risks potentially associated with facility emissions were not assessed in terms of cancer burden. Cancer burden is a hypothetical upper-bound estimate of the additional number of cancer cases that could be associated with emissions from the facility. Cancer burden is calculated as the worst-case product of excess lifetime cancer risk, at the 1×10^{-6} isopleth and the number of individuals at that risk level. Cancer burden evaluations are not required by the Air District.

The chronic non-cancer hazard quotient associated with concentrations in air are shown in Table 4.3-26 and Table 4.3-27 above. The chronic non-cancer hazard quotient for all target organs falls well below 1.0. As described previously, a hazard quotient less than 1.0 is unlikely to represent significant impact to public health. Since DPM does not have an acute REL, no acute hazard index or quotient was calculated. As described previously, human health risks associated with emissions from the proposed facility are unlikely to be higher at any other location than at the location of the PMI. If there is no significant impact associated with concentrations in air at the PMI location, it is unlikely that there would be significant impacts in any other location in the vicinity of the CABGF/CADC Site.

Detailed risk and hazard values are provided in the HARP output which will be submitted to Staff electronically.

The estimates of excess lifetime cancer risks and non-cancer risks associated with chronic or acute exposures fall below thresholds used for regulating emissions of toxic pollutants to the air. Historically, exposure to any level of a carcinogen has been considered to have a finite risk of inducing cancer. In other words, there is no threshold for carcinogenicity. Since risks at low levels of exposure cannot be quantified directly by either animal or epidemiological studies, mathematical models have estimated such risks by extrapolation from high to low doses. This modeling procedure is designed to provide a highly conservative estimate of cancer risks based on the most sensitive species of laboratory animal for extrapolation to humans (i.e., the assumption being that humans are as sensitive as the most sensitive animal species). Therefore, the true risk is not likely to be higher than risks estimated using unit risk factors and is most likely lower and could even be zero.

An excess lifetime cancer risk of 1×10^{-6} is typically used as a screening threshold of significance for potential exposure to carcinogenic substances in air. The excess cancer risk level of 1×10^{-6}, which has historically been judged to be an acceptable risk, originates from efforts by the Food and Drug Administration to use quantitative risk assessment for regulating carcinogens in food additives in light of the zero-tolerance provision of the Delany Amendment[42]. The associated dose, known as a "virtually safe dose" has become a standard used by many policy makers and the lay public for evaluating cancer risks. However, a study of regulatory actions pertaining to carcinogens found that an acceptable risk level can often be determined on a case-by-case basis. This analysis of 132 regulatory decisions found that regulatory action was not taken to control estimated risks below 1×10^{-6}, which are called de minimis risks. De minimis risks are historically considered risks of no regulatory concern. Chemical exposures with risks above 4×10^{-3}, called de manifestis risks, were consistently regulated. De manifestis risks are typically risks of regulatory concern. The risks falling between these two extremes were regulated in some cases, but not in others.[43]

The estimated lifetime cancer risks to the maximally exposed individual located at the CABGF PMI, MEIR, MEIW, and MEIS do not exceed the 10×10^{-6} significance level for T-BACT sources. These engines are EPA Tier 4 units equipped with diesel particulate filters, and are used only for emergency power backup, therefore BACT and T-BACT for DPM is satisfied. The chronic hazard index value is also well below the significance threshold of 1.0. These risk estimates were calculated using assumptions that are highly health conservative. Evaluation of the risks associated with the CABGF emissions should consider that the conservatism in the assumptions and methods used in risk estimation considerably over-state the risks from CABGF emissions. Based on the results of this risk assessment, there are no significant public health impacts anticipated from emissions of toxic pollutants to the air from the CABGF.

[42] Use of Quantitative Risk Assessment in Regulatory Decision Making Under Federal Health and Safety Statutes, in Risk quantitation and Regulatory Policy, P.B. Hutt, et.al., Banbury Report 19, Cold Springs Harbor Laboratory, 1985.
[43] Cancer Risk Management: A Review of 132 Federal Regulatory Cases, Travis, et.al., Environmental Science and Technology, 21:415-420, 1987.

Operation Odors

The CABGF/CADC is not expected to produce any contaminants at concentrations that could produce objectionable odors.

Summary of Impacts

The health risk assessment for the CABGF indicates that the maximum operational cancer risk will be approximately 4.16 x 10^{-7} (versus a significance threshold of 10 x 10^{-6} with T-BACT) at the MEIR to air toxics from CABGF emissions. This risk level is considered to be not significant. Non-cancer chronic effects for all scenarios are well below the chronic hazard index significance value.

Results from an air toxics risk assessment based on emissions modeling indicate that there will be no significant incremental public health risks from the construction and operation of the CABGF. Results from criteria pollutant modeling for routine operations indicate that potential ambient concentrations of NO_2, CO, SO_2, $PM_{2.5}$ and PM_{10} will not significantly impact air quality. Potential concentrations are below the federal and California standards established to protect public health, including the more sensitive members of the population.

CalEnviroScreen 5.0 Survey

Pursuant to recent amendments to Air District Regulation 2 Rules 1 and 5 which address a lower risk threshold value for sources located in or within 1,000 feet of an Overburdened Community (an area with a percentile rating of greater than or equal to 70th percentile, the maximum allowed risk from such facilities is 6 x 10^{-6} in place of 10 x 10^{-6}). There is no change to the cumulative risk value threshold of 100-in-a-million. A review of the CalEnviroScreen maps as of October 2026 indicates the following:

- The Project Site is situated in census zone 6085505006, rated at the 31st percentile.
- To the east lies census zone 6085504318 rated at the 75th percentile.
- To the south lies census zone 6085505100 rated at the 71st percentile.
- To the west lies census zone 6085505100 rated at the 76th percentile.
- The project site is situated approximately 2,417 feet away from nearest zone (6085504318) which is rated at the 75th percentile or higher. This zone is also considered to be an Overburdened Community.

Based on the above, the Project would not be subject to the lower risk threshold applicable to an Overburdened Community per Regulation 2 Rules 1 and 5 (i.e., the distance from the Project Site to a known Overburdened Community is greater than 1,000 feet).

4.3.2.4 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative air quality impact?

Implementation of the 2017 CAP

As described above under checklist question a), the Project would be consistent with the 2017 CAP. The Project, therefore, would not result in a cumulatively considerable impact with respect to the implementation of the 2017 CAP.

Increase in Criteria Pollutants

As discussed under checklist question a) and b), the construction emissions generated by the Project would not exceed the Air District's thresholds for criteria air pollutant emissions, and offsets would be purchased to reduce operational emissions below applicable thresholds. Therefore, the Project would not result in a cumulatively considerable contribution to criteria pollutant emissions.

Exposure Sensitive Receptors to Substantial Pollutant Concentrations

A project would have a cumulative considerable impact if the aggregate total of all past, present, and foreseeable future sources within a 1,000-foot radius from the fence line of a source plus the contribution from the project, exceeds the significance thresholds shown above in Table 4.3-6.

Cumulative Impacts Assessment

Stationary and mobile cumulative source impacts were not assessed for the proposed Project as the nearest sensitive receptor is over 4,500 feet from the Project fence line, which is beyond the 1,000 foot radius established by the Air District for cumulative assessments. However, for summary purposes, cumulative risks from permitted stationary sources of TACs near the Project Site were identified using Air District's Stationary Source Risk and Hazard Analysis Tool. This mapping tool uses Google Earth to identify the location of stationary sources and their estimated screening level cancer risk and hazard impacts. This tool identified four sources within 2,000 feet of the Project boundaries and the distance adjusted impacts are summarized in Table 4.3-28. The Air District Health Risk Calculator was utilized to adjust the Air District provided risk, hazard and $PM_{2.5}$ concentrations based on distance.

Table 4.3-28: Combined Source Listing (With Air District Distance Adjustments for PM2.5)

Source	Maximum Cancer Risk (per million)	Chronic Hazard Index	$PM_{2.5}$ concentration ($\mu g/m^3$)
Deliverex	1	0	0
California Highway Patrol	10	0.08	0.05
California Highway Patrol	1	0	0
Storopack	4	0.15	0.01
Mobile Sources	5	0.01	0.6
Proposed Charcot Project	0.46	0.0001	0.05
Total Combined Sources[1]	19.5	0.24	0.71
Air District Threshold – Combined Sources	100	10.0	0.8

Based on actual distances to the sensitive receptors, the summarized impacts would be much smaller than the listed results.

Note: [1]*The combined source level represents a significant overestimate because the maximum impact from each source is assumed to occur at the same location.

Sources: Bay Area Air District. "Mobile Source Screening Tool." Accessed June 2026. https://experience.arcgis.com/experience/89ba715c4dc7427f85e2d2fc5b8175ff/page/Stationary-Source-Screening-Tool?draft=true.

Bay Area Air District. "Health Risk Calculator with Distance Multipliers." Accessed June 2026. https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/health-risk-screening-and-modeling.

The cumulative cancer and hazard index impacts are all less than the Air District CEQA thresholds. All PM2.5 concentrations for the CABGF at all sensitive receptors are below the Air District annual cumulative significance criteria of 0.8 ug/m^3 and below the NAAQS significance level of 0.13 ug/m^3. Thus, regardless of the background cumulative $PM_{2.5}$ impacts, the projects contributions will always be less than the Air District CEQA significance levels and represent a less than significant impact.

4.4 Biological Resources

The following discussion is based upon an Arborist Report prepared by HMH dated April 7, 2026 for the CABGF/CADC Site, and Biological Resources Reports (BRR) prepared for the CABGF/CADC (June 2026) and the Trimble Substation Expansion (August 2026) Sites by H. T. Harvey & Associates, Inc. Copies of these reports are included as Appendix G and Appendix H of this SPPE Application, respectively. The BRR recommends mitigation measures to reduce impacts. The Applicant has incorporated these recommendations into PDMs as discussed below.

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

Individual plant and animal species listed as rare, threatened, or endangered under state and federal Endangered Species Acts are considered special-status species. Federal and state endangered species legislation has provided the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the take of a species listed as threatened or endangered. To "take" a listed species, as defined by the State of California, is "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" these species. Take is more broadly defined by the federal Endangered Species Act to include harm of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Sections 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, must be considered as part of the environmental review process. These may include plant species listed by the California Native Plant Society and CDFW-listed Species of Special Concern.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

Fish and Game Code Section 1602

Streambeds and banks, as well as associated riparian habitat, are regulated by the CDFW per Section 1602 of the Fish and Game Code. Work within the bed or banks of a stream or the adjacent riparian habitat requires a Streambed Alteration Agreement from the CDFW.

Regional

Santa Clara Valley Habitat Plan

The Santa Clara Valley Habitat Plan (Habitat Plan) covers approximately 520,000 acres, or approximately 62 percent of Santa Clara County. It was developed and adopted through a partnership between Santa Clara County, the Cities of San José, Morgan Hill, and Gilroy, Santa Clara Valley Water District (Valley Water), Santa Clara Valley Transportation Authority (VTA), USFWS, and CDFW. The Habitat Plan is intended to promote the recovery of endangered species and enhance ecological diversity and function, while accommodating planned growth in southern Santa Clara County. The Santa Clara Valley Habitat Agency is responsible for implementing the plan.

PG&E's Bay Area Habitat Conservation Plan

PG&E's Bay Area Habitat Conservation Plan (Bay Area HCP) provides a comprehensive framework for conserving sensitive habitats for preserving protected species. It is a 30-year permit issued by the USFWS to allow PG&E to comply with the federal Endangered Species Act more efficiently. The Bay Area HCP covers the nine counties that surround the San Francisco Bay, including Alameda, Santa Clara, San Mateo, San Francisco, Contra Costa, Marina, Sonoma, Napa, and Solano. Within these counties, the plan areas include PG&E gas and electric transmission and distribution facilities, rights-of-way (including standard buffers), lands owned by PG&E and/or subject to PG&E easements, access routes, and mitigation areas acquired to mitigate impacts resulting from covered activities.

The Bay Area HCP protects 18 wildlife species and 13 plant species and the habitats where they are found for 33 routine operations and maintenance activities. The Bay Area HCP includes a number of avoidance and minimization measures (AMMs) to reduce impacts on sensitive habitats and covered species during performance of covered activities. Furthermore, PG&E has identified "hot zones" where certain covered species are known to occur and where AMMs specific to those species are implemented.

PG&E Avoidance Minimization Measures and Best Management Practices

The Bay Area HCP AMMs and BMPs are part of PG&E's project construction and design process and are referred to as PG&E Programmatic Measures instead of mitigation measures. Applicable biological resources measures from the Bay Area HCP are listed in Table 4.4-1.

Table 4.4-1: Applicable Bay Area Habitat Conservation Plan Avoidance and Minimization Measures for Project Activities

HCP Code[1]	Description of Measure
FP-01	Hold annual training on habitat conservation plan requirements for employees and contractors performing covered activities in the Plan Area that are applicable to their job duties and work.
FP-02	Park vehicles and equipment on pavement, existing roads, or other disturbed or designated areas (barren, gravel, compacted dirt).
FP-03	Use existing access and ROW roads. Minimize the development of new access and ROW roads, including clearing and blading for temporary vehicle access in areas of natural vegetation.
FP-04	Locate off-road access routes and work sites to minimize impacts on plants, shrubs, and trees, small mammal burrows, and unique natural features (e.g., rock outcrops).
FP-07	Vehicle speeds on unpaved roads will not exceed 15 miles per hour.
FP-08	Prohibit trash dumping, firearms, open fires (such as barbecues), hunting, and pets (except for safety in remote locations) at work sites.
FP-11	Utilize standard erosion and sediment control BMPs (pursuant to the most current version of PG&E's Stormwater Field Manual for Construction Best Management Practices) to prevent construction site runoff into waterways.
FP-12	Stockpile soil within established work area boundaries and locate stockpiles so as not to enter water bodies, stormwater inlets, or other standing bodies of water. Cover stockpiled soil prior to precipitation events.
FP-15	Prohibit vehicular and equipment refueling 250 feet from the edge of vernal pools, and 100 feet from the edge of other wetlands, streams, or waterways. If refueling must be conducted closer to wetlands, construct a secondary containment area subject to review by an environmental field specialist and/or biologist. Maintain spill prevention and cleanup equipment in refueling areas.
FP-16	Maintain a buffer of 250 feet from the edge of vernal pools and 50 feet from the edge of wetlands, ponds, or riparian areas. If maintaining the buffer is not possible because the areas are either in or adjacent to facilities, the field crew will implement other measures as prescribed by the land planner, biologist, or HCP administrator to minimize impacts by flagging access, requiring foot access, restricting work until dry season, or requiring a biological monitor during the activity.
FP-17	Directionally fell trees away from an exclusion zone, if an exclusion zone has been defined. If this is not possible, remove the tree in sections. Avoid damage to adjacent trees to the extent possible. Avoid removal of snags and conifers with basal hollows, crown deformities, and/or limbs over 6 inches in diameter.
FP-18	Nests with eggs and/or chicks will be avoided: contact a biologist, land planner or the Avian Protection Program manager for further guidance.
Wetland-2	Identify wetlands, ponds, and riparian areas and establish buffers. Maintain a buffer of 50 feet around wetlands, ponds, and riparian areas. If maintaining the buffer is not possible because the areas are either in or adjacent to facilities, the field crew will implement other measures as prescribed by the biologist or HCP administrator to minimize impacts. These measures include

HCP Code[1]	Description of Measure
	flagging access, requiring foot access, restricting work until the dry season, requiring a biological monitor during the activity, or excavating burrows in ROWs where trenching will occur. Activities must maintain the downstream hydrology to the wetland, pond, or riparian area. Additional minimization measures may be implemented with prior concurrence from USFWS.
BMP 12	After vegetation management activities, if the amount of bare soil exposed in one location exceeds 0.1 acre, then erosion control measures shall be implemented. These measures may include straw mulching, seeding, and use of straw waddles. (No rice straw will be used around wetlands containing vernal pools.)
BMP 16	All PG&E employees and contractors shall follow the Vegetation Management Migratory Bird Process, when applicable to vegetation management activities, to comply with Migratory Bird Treaty Act.
BMP 23	If an environmental protection incident occurs, such as accidental introduction of substances into waterways or wetlands, accidental taking of an endangered species, or hazardous material spills, etc., call your supervisor and the PG&E vegetation management representative immediately.
BMP 25	The disturbance or removal of vegetation within the work area shall not exceed the minimum necessary to complete operations, subject to other public and health and safety directives governing the safe operations and maintenance of electric and gas facilities. Precautions shall be taken to avoid damage to non-target vegetation.
BMP 26	Cleared or pruned vegetation, grass clippings and woody debris (including chips) shall be disposed of in a legal manner. All cleared vegetation and debris, grass clippings and woody debris (including chips) shall be removed from any wetland, ditch, pond, or stream and placed or secured where they cannot re-enter the watercourse.
BMP 27	Vegetation that at mature height does not pose a threat to the conductors shall not be removed, unless the removal is required to maintain compliance with California Public Resource Code Section 4292 (pole clearing).
BMP 28	Any vehicles driven and/or operated within or adjacent to streams shall be checked and maintained daily to prevent leaks of materials that, if introduced to the water, could be harmful to aquatic life.
BMP 29	Vehicle access to streams and wetlands shall be limited to existing roads and crossings.
BMP 30	When possible, activities near streams, wetlands, or on saturated soils shall be conducted during the dry season (generally May 15–October 15) or during periods of minimum flow. If it is not possible to perform the work in the dry season, perform rainy season work during dry spells between rain events.
BMP 52	Sensitive habitats such as meadows, riparian areas, wetlands, vernal pools, and serpentine outcrops shall be flagged and appropriate avoidance measures shall be put in place. Tailboards shall be held before work begins.
BMP 62	The following protection measures are designed to prevent adverse impacts on water quality, help protect soil resources, and minimize the loss of riparian vegetation. Plants in watercourse protection zones that do not pose an imminent or clearly foreseeable future threat to conductors shall not be removed. To help prevent erosion and soil displacement, exclusion zones may be increased in areas with steep slopes or highly erodible soils. Leave at least 50% soil cover (i.e., mulch or vegetative ground cover) for erosion control in watercourse protection zones.

HCP Code[1]	Description of Measure
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BMP 23	If an environmental protection incident occurs, such as accidental introduction of substances into waterways or wetlands, accidental taking of an endangered species, or hazardous material spills, etc., call your supervisor and the PG&E vegetation management representative immediately.
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BMP 26	Cleared or pruned vegetation, grass clippings and woody debris (including chips) shall be disposed of in a legal manner. All cleared vegetation and debris, grass clippings and woody debris (including chips) shall be removed from any wetland, ditch, pond, or stream and placed or secured where they cannot re-enter the watercourse.
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[1]FP = Field Protocol

In addition, for activities covered by the Bay Area HCP that impact more than 0.1 acres, PG&E will restore temporarily impacted habitat within 12 months of the completion of construction. Site restoration could include soil compaction, recontouring excavated areas to follow natural contours, reseeding areas cleared of plant cover, and planting trees or other vegetation.

PG&E Avian Protection Plan

To avoid and minimize impacts to nesting birds, PG&E has developed an Avian Protection Plan (APP).[44] The APP is implemented by PG&E biologists and other staff working on electric transmission and distribution facilities, as well as other PG&E activities near active bird nests (defined as nests containing eggs or young). PG&E is required to comply with federal and state laws and regulations that prohibit take of birds, including eggs or young, in active nests. Implementation of the APP includes the following:

- Utilizing avian-safe configurations for construction of new electric power facilities (i.e., poles), including framing for raptor protection (by increased separation of energized components), to the extent feasible.
- Utilizing insulation or other bird protection materials on exposed equipment leads during equipment repairs or pole retrofits.
- Providing a step-wise approach for reducing impacts on nesting birds that include:
    - Desktop review of activities by a biologist to determine the potential to impact nesting birds.
    - If, during nesting season, there is potential for an activity to impact nesting birds, pre-construction nesting bird surveys are performed.
    - When nesting birds are identified during surveys, nest buffers are assigned for the activity, depending upon species, nest phase, work activity duration, and other environmental factors (e.g., presence of visual screening).
    - For certain species (threatened, endangered, or state fully protected), PG&E will confer with USFWS and/or CDFW when a standard buffer cannot be observed for a nesting species and covered activities cannot be reasonably modified.

The APP formalizes ongoing training requirements for utility employees. Training includes introduction to federal and state laws that protect birds; facility design to reduce avian interactions; information on identification of active bird nests; and reporting requirements pertinent to PG&E's Special Purpose Utility Permit, issued by the USFWS.

PG&E follows the process and procedures outlined in PG&E's APP and Nesting Bird Management Plan (discussed below) to protect nesting birds during vegetation removal work, which include pre-activity surveys and measures to protect active nests (e.g., rescheduling the work or maintaining a buffer around the active nest).

PG&E Nesting Bird Management Plan

To avoid impacts to nesting birds and maintain compliance with the Migratory Bird Treaty Act and state statute, PG&E has developed a comprehensive plan to avoid and minimize impacts on nesting

[44] California Department of Fish and Wildlife. *PG&E Bay Area O&M Incidental Take Permit Environmental Impact Report Volume 2. Final EIR.* June 2022. Pages 3.4-91 through 3.4-92.

birds. This management plan is implemented when PG&E activities are near active bird nests, which are defined as an active nest containing eggs or young. PG&E's Nesting Bird Management Plan is intended to do the following[45]:

- Maintain compliance with applicable federal and state bird protection regulations.
- Avoid and minimize disturbance to nesting birds within PG&E's service area.
- Standardize PG&E's approach to managing nesting bird conflicts using accepted wildlife management practices.

Implementation of the Nesting Bird Management Plan allows for consistent application of avoidance and minimization measures for nesting birds across PG&E activities, provides structured and standardized decision making, and allows PG&E to comply with federal and state regulations applicable to nesting birds. A step-wise compliance approach guides implementation of the Nesting Bird Management Plan is as follows:

- **Step 1: Conduct desktop review** as part of the environmental review and planning process prior to initiating activities in locations that provide suitable habitat for nesting birds. A qualified biologist determines if there is potential for the activity to impact nesting birds.
- **Step 2: Conduct preconstruction nesting bird surveys,** if there is potential to impact active nests in or near construction areas. Pre-construction surveys can detect recent or established nests and identify the need to implement or adjust standard exclusion buffers.
- **Step 3: Assign nest exclusion buffers** or other applicable AMMs around active nests. These nest exclusion buffers are species-specific, may be standard or reduced and may include periodic nest monitoring.
- **Step 4: Confer** with the USFWS and/or CDFW, as necessary. PG&E may confer with USFWS and/or CDFW when the standard buffer cannot be observed for a nesting threatened, endangered or fully protected species.

<u>Bay Area Operations and Maintenance Incidental Take Permit Final Environmental Impact Report</u>

The Bay Area Operations & Maintenance Incidental Take Permit (ITP) FEIR (O&M FEIR) for CDFW's 2022 PG&E Bay Area ITP (#2081-2015-031-03) covers PG&E's Bay Area operations and maintenance and minor new construction activities, and establishes a comprehensive approach to avoid, minimize, and fully mitigate impacts on species and habitat, including common and special-status species that are not covered under the Bay Area HCP. The ITP provides incidental take coverage for three species, the California tiger salamander, Alameda whipsnake, and California freshwater shrimp (covered species). Applicable measures from the Bay Area O&M FEIR that are identified in this SPPE Application are provided in Table 4.4-2 below.[46]

[45] Ibid. Appendix C. Page 2-5.
[46] California Department of Fish and Wildlife. *PG&E Bay Area O&M Incidental Take Permit Environmental Impact Report Volume 2. Final EIR.* June 2022

Table 4.4-2: Programmatic Measures from the PG&E Operations & Maintenance Incidental Take Permit FEIR for Biological Resource Impacts

PG&E Programmatic Measures	Description of Measure
BIO-1: Prevent or minimize spread of invasive weeds	The following will be implemented on E9a (Reconductoring), G9 (Pipeline Lowering), G11 (Pipeline Replacement), and minor new construction to prevent the spread of invasive weeds during all phases of covered activities, as appropriate: • During covered activities involving ground disturbance, mud and/or accumulated soils will be removed from equipment and vehicles, to the extent feasible. Vehicles and equipment will be cleaned or washed before entering a new work site. A log will be kept for each job site and would be completed to document each cleaning or washing of vehicles or equipment before entering each new work site. • Vehicles will be staged and stored on paved or cleared areas whenever feasible. • Certified weed-free mulch, straw, hay bales, or equivalent materials will be used where necessary for covered activities.
BIO-2: Protect special-status wildlife encountered while performing covered activities and report covered wildlife observations	Any special-status wildlife species encountered during the course of a covered activity will be allowed to leave the area unharmed, and work activities that could disturb or harm the individual will halt until the wildlife has left the area. Encounters with a special-status species will be reported to a qualified biologist and PG&E environmental staff. PG&E will maintain records of all covered wildlife species encountered during permitted activities. Encounters with covered wildlife species will be documented and provided to CDFW in an annual report as required by the ITP. If a covered wildlife species is encountered during the course of operations, the following information will be reported for each species: • The locations (i.e., narrative, vegetation type, and maps) and dates of observations, including occurrences observed during any required surveys. • The general condition of individual health (e.g., apparent injuries). • If the species is moved, the location where the species was captured and the location where it was released. • The locations, dates, and species and behaviors observed during covered wildlife monitoring. When conducting covered activities E9a (Reconductoring), G9 (Pipeline Lowering), G11 (Pipeline Replacement), and minor new construction PG&E will document encounters with special status species to the same level of detail as required for covered species. During PG&E's environmental screening process, PG&E will also apply this measure to other covered activities to protect special status species and habitats based on recommendations from qualified biologists. This data will be provided in ITP annual reports.
BIO-3: Design and site minor new construction activities to avoid sensitive areas	New, permanent facilities as part of minor new construction activities will be sited and designed to avoid impacts on sensitive vegetation types, sensitive natural communities, and unique plant assemblages, as well as occupied habitat and suitable habitat for special-status species, to the extent feasible. If impacts on these areas cannot be avoided, PG&E will determine if additional permitting is required to conduct the work and obtain the required permits (e.g., LSAA). If impacts are expected on covered species' habitat, Mitigation Measure BIO-1 (MM BIO-1) will be implemented to mitigate for habitat impacts.

PG&E Programmatic Measures	Description of Measure
	Where minor new construction would result in impacts on sensitive vegetation types, sensitive natural communities, or unique plant assemblages, PG&E will minimize the construction footprint and implement appropriate protective measures as recommended by the qualified biologist to protect the natural community. Examples of such measures include: reseeding with a California annual seed mix, installing protective fencing around sensitive natural communities or resources, and installing wattles, erosion blankets and other drainage controls to protect new or adjacent plantings.
BIO-3a: Minimize spread of invasive plant and plant pathogens in minor new construction	When conducting minor new construction activities, PG&E will avoid or minimize the spread of invasive species by taking the following actions: • Prior to commencement of activities located on or adjacent to non-paved surfaces, a qualified biologist will flag known populations of noxious weeds and invasive plants in the work areas. Invasive plant species include those listed as invasive by the California Invasive Plant Council (Cal IPC). • PG&E will stage work in areas not infested with weeds or treat for weed removal prior to using an infested area. • Prior to ground disturbance in areas containing species susceptible to Sudden Oak Death, a qualified professional (e.g., biologist, arborist, botanist familiar with Sudden Oak Death and the vegetation communities in the area) will assess the risk of activities and will identify and implement measures to reduce or avoid the risk of Sudden Oak Death spread. These measures will include but will not be limited to the following, and will be further developed and updated based on the best available science and site-specific conditions: a. Designate quarantine areas and implement proper measures for disposal of infested materials (e.g., branches, split wood, wood chips), b. Sanitize shoes, pruning gear, and other equipment with sanitizing materials (e.g., chlorine bleach, Clorox Clean-up, Lysol, scrub brush, boot brush) before and after ground-disturbing and vegetation removal activities are implemented, • Clothing, footwear, and equipment used during minor new construction will be cleaned of soil, seeds, vegetation, or other debris or seed-bearing material before entering a work site or when leaving an area with infestations of invasive plants and noxious weeds. • Heavy equipment and other machinery used in areas with infestations of invasive plant species or Sudden Oak Death will be inspected for the presence of invasive species before use on the project site and will be cleaned before entering the site, to reduce the risk of introducing invasive plant species or plant pathogens. • To minimize the introduction and spread of noxious weeds and invasive plants, PG&E will avoid moving weed-infested gravel, rock, and other fill materials to relatively weed-free locations. In areas where invasive plants are removed during minor new construction or vegetation removal activities, PG&E will dispose of invasive plant

PG&E Programmatic Measures	Description of Measure
	biomass off site at an appropriate waste collection facility or treat biomass on site to eliminate seeds and propagules and prevent reestablishment; if moved off site, PG&E will transport invasive plant material in a closed container or bag to prevent the spread of propagules during transport. PG&E will use certified weed-free straw and mulch for erosion-control projects. PG&E will maintain stockpiled, uninfested material in a weed-free condition. • Areas where ground disturbance has resulted in exposed soil as a result of minor new construction shall be seeded with compatible California annual species, as determined by a qualified biologist or botanist familiar with the native vegetation in the area and experienced in revegetation techniques. Revegetation will occur prior to the onset of winter rains within the year initial impacts take place. If work cannot feasibly be scheduled outside the rainy season, revegetation may occur as directed by the qualified biologist and no later than the onset of the next winter rains. • To ensure a successful revegetation effort, on-site vegetation shall meet the following success criteria: a. PG&E shall perform pre-activity surveys to record baseline vegetative ground cover conditions and composition by a qualified biologist prior to covered activities as follows. The biologist will record the following: i. Absolute percent ground cover for the entire work area. ii. Relative percentages of ground cover within the work area by herbaceous plants, shrubs, trees, and noxious/invasive plants. iii. Develop a catalog of all invasive species present within the work area, including an estimate of percent composition by species. b. PG&E will conduct post-activity monitoring of work areas in the spring following completion of minor new construction. i. A qualified biologist will record any new invasive species that may have inadvertently been introduced to the work area. The biologist shall make special note of any new invasive plant species rated as “high” by the Cal IPC. ii. A qualified biologist will record whether there was an increase in relative cover of invasive species from baseline that may have resulted from the covered activity. iii. If relative cover of invasive plant species has increased within the work area, PG&E shall remove and/or dispose of invasive plants in an appropriate manner, as recommended by a qualified biologist and/or a Pest Control Advisor.5 If any new invasive plants rated by

PG&E Programmatic Measures	Description of Measure
	Cal IPC as "high" are found within the work area, they will be removed in an appropriate manner, as recommended by a qualified biologist and/or a Pest Control Advisor. iv. If the relative ground cover of invasive plants exceeds baseline by 100 percent or more, PG&E will reseed the areas where invasive plants are removed and monitor for one additional year.
BIO-6: Protect nesting birds	All vegetation clearing and ground-disturbing activities will be conducted outside of the nesting season (generally March 1–August 31) to the extent feasible. If this is not feasible, a biologist or qualified individual will determine if pre-construction activity surveys, nest buffers, and/or monitoring are needed in accordance with PG&E's Nesting Bird Management Plan. Nesting bird surveys will be scheduled to occur within a timeframe prior to construction the activity that is suitable for the detection of recently established nests. If active nests containing eggs or young are found, the qualified biologist or individual will establish an appropriate nest buffer in accordance with the species-specific buffers in PG&E's Nesting Bird Management Plan. Nest buffers under the Plan will be species-specific and can range from 15 to 100 feet for passerines, 50 to 300 feet for raptors, or larger if necessary, depending on the planned activity's level of disturbance, site conditions, and the observed bird behavior. Covered activities will not commence within the established buffer areas until the qualified biologist or individual determines that the young have fledged or the nest is no longer active. Active nests will be periodically monitored until the young have fledged or the activity all construction is finished. If birds with active nests are observed showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during covered activities, the buffer will be increased to a distance in which the behavioral signs of agitation cease, in accordance with PG&E's Nesting Bird Management Plan. As part of the ITP annual report, PG&E will provide a summary of covered activities where the Nesting Bird Management Plan was implemented; the summary will include the location, dates, species (if known), and nest buffers applied to the covered activity including buffer efficacy. (The Nesting Bird Management Plan is intended to maintain compliance with federal and state bird protection regulations through a standardized approach to avoiding and minimizing disturbance to nesting birds, including burrowing owl [see BIO-6a].)
BIO-7: Protect breeding and pupping bats	When feasible, activities directly affecting bat roosting habitat will be conducted outside of the bat breeding/pupping season (generally, April through mid-September). If work that would affect known bat breeding sites must be done in the bat breeding/pupping season, a qualified biologist would evaluate known breading/roosting sites or conduct surveys for bat roosts in suitable breeding/roosting sites (e.g., bridges, mines, caves, trees with hollows, palm trees, snags, buildings, long and dark culverts, rock outcrops, dense tree canopies, and flaking tree bark). If evidence of a bat maternity roost is found or maternity roosts are detected, PG&E will avoid conducting covered activities that may directly affect the active roost site, including the following:

PG&E Programmatic Measures	Description of Measure
	• If a maternity roost is identified then the qualified bat biologist will develop a Bat Avoidance and Monitoring Plan prior to the start of project activities that shall include: (1) an assessment of all impacts to bats from the activity, including noise disturbance during covered activities and (2) effective avoidance and minimization measures to protect bats in order to ensure that direct impact to active bat maternity roost site do not occur. Notification will be provided to CDFW prior to the start of covered activities. The notification will include a copy of the Bat Avoidance and Monitoring Plan. If direct impacts to identified maternity roost site cannot be avoided, PG&E will provide a compensatory mitigation plan to CDFW for review and approval. • As necessary, an exclusionary buffer will be maintained around active roosts. The size of the buffer will be determined by the qualified biologist based on factors such as the planned activity's level of disturbance and site conditions and will typically be 250 feet. • As necessary, a qualified biologist will monitor active roost site buffers during O&M activities to determine if roosting activity is influenced by noise or vibrations until a qualified biologist has determined if the young bats are volant (i.e., able to fly) or the roost is unoccupied. • When feasible, to protect bats and in accordance with BMP-30, tree work near riparian zones shall be conducted during the dry season (generally May 15–October 15). If it is not feasible to conduct tree work during the dry season, operations will occur between rain events or during dry spells unless there is an emergency or imminent threat to life or property.
HAZ-1: Spill Response	PG&E will implement its hazardous substance control and emergency response procedures as needed. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of construction through operation. They address worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on site. If it is necessary to store chemicals on site, they will be managed in accordance with all applicable regulations. Material safety data sheets shall be maintained and kept available on site, as applicable. In the event that soils suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during site grading activities or excavation activities, the excavated soil will be tested and, if contaminated above hazardous waste levels, will be contained and disposed of at a licensed waste facility. The presence of suspected contaminated soil will require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations. All hazardous materials and hazardous wastes shall be handled, stored, and disposed of in accordance with all applicable regulations, by personnel

PG&E Programmatic Measures	Description of Measure
	qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following: • Proper disposal of potentially contaminated soils. • Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources. • Emergency response and reporting procedures to address hazardous material spills. • Stopping work and contacting the local fire department or other agencies as appropriate. Work will resume after any necessary consultation and approval by the local fire department. • Emergency-spill response and clean up kits will be on site where they are immediately available to respond to an accidental release of a hazardous fluid or material. If applicable, a Stormwater Pollution Prevention Plan (SWPPP) will be implemented, which will also address spill response and other site-specific physical conditions to improve hazard prevention.
HAZ-2: Vehicle Refueling	No vehicles or heavy equipment will be refueled within 100 feet of a wetland, stream, or other waterway, or within 250 feet of vernal pools, unless secondary containment is used. The fueling operator must always stay with the fueling operation. Tanks may not be topped off.

City of San José

Envision San José 2040 General Plan

The following General Plan policies related to biological resources are applicable to proposed projects in San José:

Policy	Description
ER-5.1	Avoid implementing activities that result in the loss of active native birds' nests, including both direct loss and indirect loss through abandonment, of native birds. Avoidance of activities that could result in impacts to nests during the breeding season or maintenance of buffers between such activities and active nests would avoid such impacts.
ER-5.2	Require that development projects incorporate measures to avoid impacts to nesting migratory birds.
MS-21.4	Encourage the maintenance of mature trees, especially natives, on public and private property as an integral part of the community forest. Prior to allowing the removal of any mature tree, pursue all reasonable measures to preserve it.
MS-21.5	As part of the development review process, preserve protected trees (as defined by the Municipal Code), and other significant trees. Avoid any adverse effect on the health and longevity of protected or other significant trees through appropriate design measures and construction practices. Special priority should be given to the preservation of native oaks and native sycamores. When tree preservation is not feasible, include appropriate tree replacement, both in number and spread of canopy.

Policy	Description
MS-21.6	As a condition of new development, require the planting and maintenance of both street trees and trees on private property to achieve a level of tree coverage in compliance with and that implements City laws, policies or guidelines.
CD-1.24	Within new development projects, include preservation of ordinance-sized and other significant trees, particularly natives. Avoid any adverse effect on the health and longevity of such trees through design measures, construction, and best maintenance practices. When tree preservation is not feasible include replacement or alternative mitigation measures in the project to maintain and enhance our Community Forest.

San José Riparian Corridor Protection and Brid-Safe Design Policy

Council Policy 6-34 provides guidance on the implementation of riparian corridor protection consistent with all City policies and requirements for riparian protection. Council Policy 6-34 indicates that riparian setbacks should be measured from the outside edges of riparian habitat or the top of bank, whichever is greater, and that development of new buildings and roads generally should be set back 100 feet from the riparian corridor. However, Council Policy 6-34 also indicates that a reduced setback may be considered under limited circumstances, including the existence of legal uses within the minimum setback, and utility or equipment installations or replacements that involve no significant disturbance to the riparian corridor during construction and operation and that generate only incidental human activity.

San José Tree Ordinance

The City of San José maintains the urban landscape by controlling the removal of ordinance trees on private property (San José Municipal Code Section 13.32). Per the City's Municipal Code, ordinance-size trees are defined as follows: Single Trunk - 38 inches or more in circumference at 4.5 feet above ground, or Multi-trunk - The combined measurements of each trunk circumference, at 4.5 feet above ground, add up to 38 inches or more in circumference. Ordinance trees are generally mature trees that help beautify the City, slow the erosion of topsoil, minimize flood hazards, minimize the risk of landslides, increase property values, and improve local air quality. A tree removal permit is required from the City of San José for the removal of ordinance trees.

4.4.1.2 *Existing Conditions*

H. T. Harvey & Associates conducted reconnaissance-level surveys of the CABGF/CADC and Trimble Substation Expansion Sites on April 1, 2023, April 3, 2026, and June 18, 2026 (refer to Appendix H).

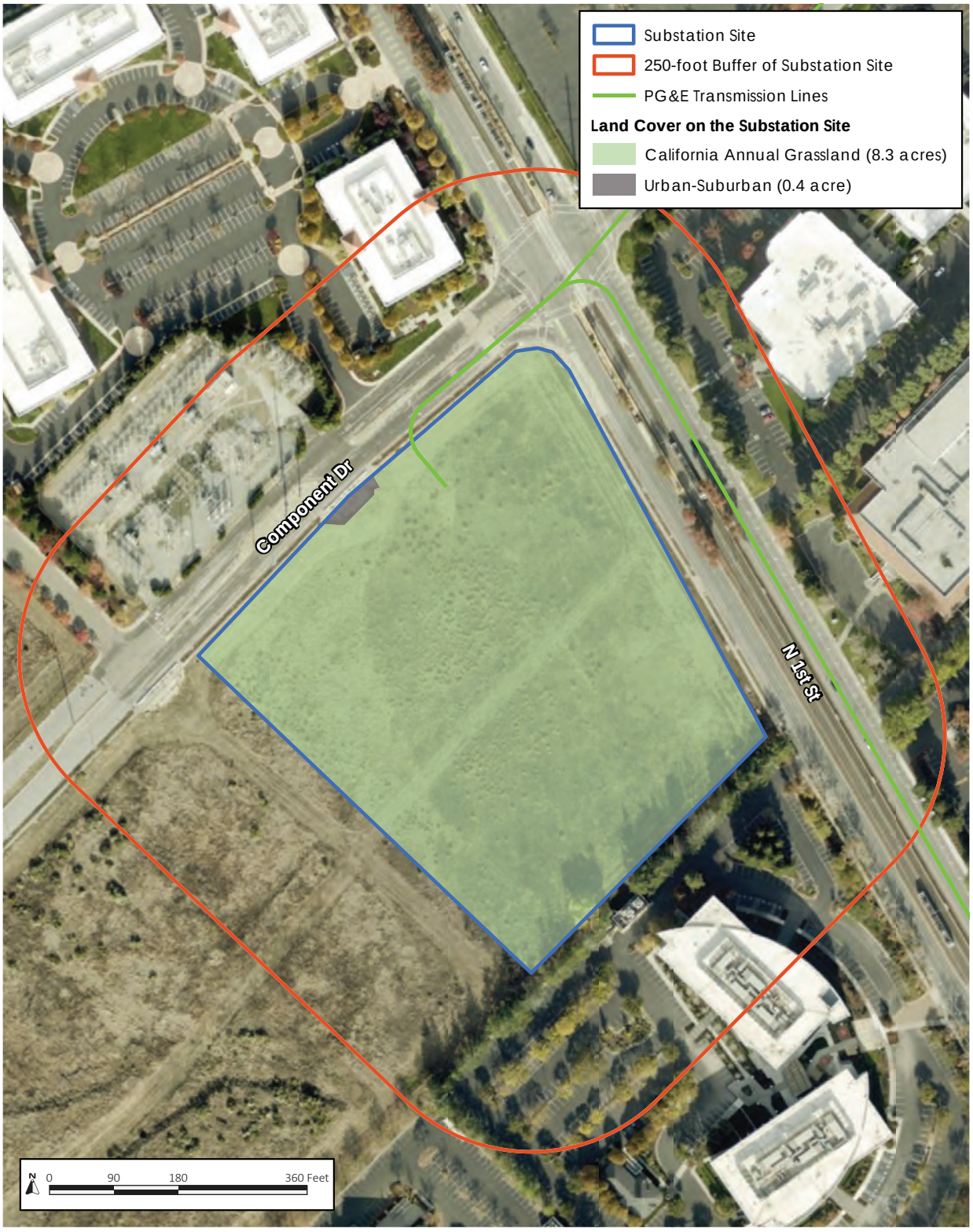
Santa Clara Valley Habitat Plan Land Covers

The CABGF/CADC Site is mapped as urban-suburban, ornamental woodland, California annual grassland under the Habitat Plan, as shown in Figure 4.4-1. The Trimble Substation Expansion Site is mapped as urban-suburban and California annual grassland under the Habitat Plan, as shown in Figure 4.4-2.



Source: H.T. Harvey & Associates, June 2026.

Biological Resource Land Cover Map for the CABGF/CADC Site | FIGURE 4.4-1



Source: H.T. Harvey & Associates, August 2026.

BIOLOGICAL RESOURCE LAND COVER MAP FOR THE TRIMBLE SUBSTATION EXPANSION SITE | FIGURE 4.4-2

Urban-Suburban

The majority of the CABGF/CADC Site is classified as urban-suburban habitat and is developed with buildings, parking areas, and pedestrian walkways. Landscaped vegetation in this area is limited in extent and predominately nonnative and regularly maintained by landscapers. Tree species include cherry plum and silver dollar. Common shrubs and herbaceous species include nonnative trailing lantana, Sydney golden wattle, slender myoporum, cherry laurel, spiny-headed mat-rush, ornamental rose, star jasmine, Indian hawthorn, common oleander, and English ivy. The urban-suburban habitat of the CABGF/CADC Site serves as wildlife habitat only in a very limited capacity, and most wildlife species that occur in these areas are tolerant of frequent human disturbances. Species that use these areas include the nonnative European starling, rock pigeon, house mouse, and Norway rat, as well as the native raccoon and striped skunk. Western fence lizards commonly occur in urban-suburban areas and may bask on road or parking lot surfaces in order to raise their body temperature. Bird species including the native American crow, house finch, lesser goldfinch, Anna's hummingbird, California towhee, bushtit, dark-eyed junco, and mourning dove will nest and forage in landscape vegetation. Large trees adjacent to the CABGF/CADC Site provide potential nesting sites for raptors, such as red-shouldered hawks and Cooper's hawks. One old, inactive raptor nest was observed in a tree adjacent to the CABGF/CADC Site, indicating that raptors have nested near the CABGF/CADC Site in a previous year. No suitable habitat for roosting bats was observed in urban-suburban habitat of the CABGF/CADC Site.

A small portion of the Trimble Substation Expansion Site is classified as urban-suburban habitat and is developed with paved driveways with patches of nonnative grasses and forbes, such as wild oat and Italian thistle. Wildlife occurring on this portion of the Trimble Substation Expansion Site would be similar to those described above.

Ornamental Woodland

A small portion of ornamental woodland habitat is located on the CABGF/CADC Site's border along Charcot Avenue and Zanker Road. Species composition within this woodland includes a mix of native and nonnative ornamental trees. Dominant species include nonnative shamel ash and locally nonnative coast redwood. Other species include nonnative narrow leaved ash and London plane tree as well as native coast live oak. The ornamental woodland habitat on the CABGF/CADC Site provides limited habitat for wildlife species due to its limited extent and the predominantly nonnative tree species present. Wildlife species that breed and forage in this habitat are similar to the species that breed and occur in adjacent urban-suburban habitat of the CABGF/CADC Site, discussed above. Raptors can potentially use larger trees within this habitat for nesting, although no existing nests of raptors were observed in these areas during the 2026 site visit. Although several small cavities are present in these trees, no high-quality habitat for roosting bats was observed.

California Annual Grassland

California annual grassland is located on the CABGF/CADC Site along the railroad tracks on the site's northeastern boundary. This habitat is dominated by nonnative annual grasses and forbs that are

periodically maintained by mowing—a dense herbaceous layer approximately one-foot tall was present at the time of the April 2026 survey. Common species include nonnative ripgut brome, oat, black mustard, shortpod mustard, redstem filaree, fennel, Russian thistle, Bermuda grass, poison hemlock, and Himalayan blackberry. Wildlife use of the California annual grassland on the CABGF/CADC Site is extremely limited due to the limited extent of this habitat, its isolation from natural areas in the region, and high levels of human disturbances (e.g., from mowing as well as adjacent vehicle and pedestrian traffic). The wildlife species that occur in this habitat primarily inhabit adjacent urban-suburban areas and use this grassland for foraging. Such species include the house finch, bushtit, and lesser goldfinch, which forage on seeds in grassland areas, as well as the black phoebe, which forages aerially over grassland habitats for insects. No small mammal burrows were detected in the California annual grassland on the CABGF/CADC Site. Common rodent species that can potentially occur in this habitat include the native California vole and deer mouse, as well as the nonnative house mouse and Norway rat. Other common, urban-adapted mammals such as the native striped skunk and raccoon as well as the nonnative Virginia opossum and feral cat may travel through the Site and forage in the grassland habitat. Common reptile species, such as the western fence lizard, will also occur here.

The majority of the Trimble Substation Expansion Site consists of California annual grassland. It is dominated by nonnative grasses including wild oat, smilo grass, wall barley, Harding grass, and Italian rye grass. Some areas also contain native grasses including purple needle grass, western wild rye, and short-antlered barley. Forbes on the Trimble Substation Expansion Site include milk thistle, prickly lettuce, crowded dock, wild radish, field bindweed, grayish shortpod mustard, white horse-nettle, heart-podded hoary cress, California poppy, yellow sweetclover, and bird's foot trefoil. Wildlife that can occur at the Trimble Substation Expansion Site consists of the same species discussed above at the CABGF/CADC Site, with the addition of the cliff swallow, Mexican free-tailed bat, California ground squirrel, California vole, Botta's pocket gopher, deer mouse, red-tailed hawks, gopher snake, and southern alligator lizard. The Trimble Substation Expansion Site is regularly maintained by mowing.

Special Status Species

Under CEQA, special-status species are considered to be those that are protected by state, federal, or local governments as "threatened, rare, or endangered," as described in further detail below.

Special-status plants are considered plant species that are:

- Listed under Federal Endangered Species Act (FESA) as threatened, endangered, proposed threatened, proposed endangered, or a candidate species;
- Listed under the California Endangered Species Act (CESA) as threatened, endangered, rare, or a candidate species;
- Listed by the California Native Plant Society (CNPS) as California Rare Plant Rank (CRPR) 1A, 1B, 2, 3, or 4.

Special-status animals are considered animal species that are:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species;
- Listed under CESA as threatened, endangered, or a candidate threatened or endangered species;
- Designated by the CDFW as a California species of special concern;
- Listed in the California Fish and Game Code as fully protected species.

Special Status Plants

Based on a review of the CNPS, California Natural Diversity Database (CNDDB), and Habitat Plan, 55 special-status plant species were identified that could potentially occur on the CABGF/CADC Site and 52 special-status plant species were identified that could potentially occur on the Trimble Substation Expansion Site; however, with the exception of one species on the Trimble Substation Expansion Site, all species were determined to be absent from the Sites for at least one of the following reasons: (1) absence of suitable habitat types; (2) lack of specific microhabitat or edaphic requirements, such as serpentine soils; (3) the elevation range of the species is outside of the range of the Sites; and/or (4) the species is presumed extirpated from the project region.

The one special-status plant species with potential to occur on the Trimble Substation Expansion Site is Congdon's tarplant. A focused survey during this species' blooming season was conducted as part of the site visit performed in June 2026. No individual taplants were observed during the survey; therefore, it is concluded that Congdon's tarplant is absent from the Trimble Substation Expansion Site.

Special Status Animals

A review of the CABGF/CADC and Trimble Substation Expansion Sites found that, with the exception of three species on the Trimble Substation Expansion Site, all special-status species would be absent from the Sites because they lack suitable habitat, are outside the known range of the species, and/or are isolated from the nearest known extant populations by development or otherwise unsuitable habitat. Golden eagles and bald eagles may fly over the Sites at times; however, none are expected to nest in, or make regular/heavy use of, any resources on the Sites. The western bumble bee occurred historically in the South Bay but no longer occurs in the region due to range contractions. The yellow warbler, monarch butterfly, grasshopper sparrow, tricolored blackbird, Bryant's savannah sparrow, and pallid bat can potentially forage on the Sites; however, no suitable nesting or roosting habitat occurs on or near the Sites. As a result, these species are not considered "special-status."

The three special-status species that could potentially breed or occur on the Trimble Substation Expansion Site are Crotch's bumble bee, white-tailed kite, and burrowing owl.

Sensitive Natural Communities and Wetlands

Sensitive natural communities and wetlands are absent from the Project Component Sites and no sensitive vegetation alliances occur on the Site.

Wildlife Movement

Movement corridors are segments of habitat that provide linkage for wildlife through the mosaic of suitable and unsuitable habitat types found within a landscape while also providing cover. On a broader level, corridors also function as paths along which wide-ranging animals can travel, populations can move in response to environmental changes and natural disasters, and genetic interchange can occur. In California, environmental corridors often consist of riparian areas along streams, rivers, or other natural features.

Due to the presence of development on all sides of the CABGF/CADC and Trimble Substation Expansion Sites and the lack of continuous, well-vegetated pathways through the Sites and nearby urban areas, there are currently no well-defined or important movement corridors for animals on or through the Sites. Urban-adapted wildlife such as birds, raccoons, striped skunks, and western fence lizards that reside in the urban landscape habitats may move through the Site using cover and refugia as they find them available. Although roads, fences, and buildings constrain such movements, these urban-adapted species are able to move within and throughout the majority of the project vicinity, either during longer dispersal events or over time and generations.

Existing Trees

The City of San José maintains the urban landscape by controlling the removal of ordinance trees on private property (San José Municipal Code Section 13.32). Ordinance trees are defined as trees exceeding 38 inches in circumference, or approximately 12 inches in diameter, at a height of 4.5 feet above the ground. Ordinance trees are generally mature trees that help beautify the City, slow the erosion of topsoil, minimize flood hazards, minimize risk of landslides, increase property values, and improve local air quality.

A total of 72 trees were identified on the CABGF/CADC Site, of which 68 were identified as ordinance-sized trees under the City's Tree Removal Ordinance. Refer to Appendix G for the summary of existing trees on the CABGF/CADC Site. The Trimble Substation Expansion Site contains two trees, of which one is ordinance-sized.

PG&E Transmission Lines

The PG&E transmission line routes are located within the public right-of-way on Charcot Avenue, E. Brokaw Road, N. First Street, Component Drive, and Zanker Road.

4.4.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
e) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?	☐	☐	☒	☐
f) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	☐	☐	☐	☒
g) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
h) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites?	☐	☐	☒	☐
i) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
j) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐
Would the project result in a cumulatively considerable contribution to a significant cumulative biological resources impact?	☐	☐	☒	☐

4.4.2.1 *Project Impacts*

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Impacts on California Annual Grassland and Ornamental Woodland and Associated Common Plant and Wildlife Species

The CABGF/CADC would result in 0.5-acre and one-acre of permanent impacts on California annual grassland and ornamental woodland habitat, respectively, and the Trimble Substation Expansion would result in 8.3-acres of permanent impacts on California annual grassland, which would reduce the availability of this habitat and result in a reduction in abundance of some of the common plant and wildlife species that occur on the CABGF/CADC and Trimble Substation Expansion Sites. However, while the Project would result in the loss of California annual grassland and ornamental woodland habitat, this area of California annual grassland and ornamental woodland is regularly disturbed, located in a highly urbanized area, and does not provide regionally rare or especially high-value habitat for native vegetation or wildlife, or special-status species. Furthermore, California annual grassland and ornamental woodland is a widespread habitat within the Habitat Plan area. Since the quality of California annual grassland habitat and ornamental woodland that would be permanently impacted is not of high-value and would not reduce regional populations of animal species, impacts would be less than significant. **(Less than Significant Impact)**

Impacts on Water Quality and Special-Status Fish

There are no aquatic resources on the CABGF/CADC or Trimble Substation Expansion Sites; thus, the Project will have no direct impacts on aquatic resources. Coyote Creek, located 0.4-mile northeast of the CABGF/CADC Site, and the Guadalupe River, located 0.5-mile southwest of the Trimble Substation Expansion Site, support aquatic habitats and special-status fish species including the Central California Coast steelhead and Central Valley fall-run Chinook salmon. Due to the distance between the Sites and Coyote Creek and the Guadalupe River, the project will have no indirect impacts on special-status fish species or their habitats. Additionally, as a project covered under the Habitat Plan, the Project would be required to comply with Condition 3, which states projects disturbing one acre or more must comply with the State requirements under the Municipal Regional Stormwater National Pollutant Discharge Elimination System General Construction Permit (as discussed more in Section 4.10 Hydrology and Water Quality). Compliance with this permit would reduce temporary impacts to water quality due to construction activities. Compliance with applicable State water quality permit requirements, combined with the absence of project-related effects to Coyote Creek and the Guadalupe River, would ensure that the Project would not result in impacts to water quality in the creek or to special-status fish species within it. **(Less than Significant Impact)**

Impacts on Crotch's Bumble Bee

Trimble Substation Expansion Site

The California annual grassland habitat on the Trimble Substation Expansion Site provides only low-quality habitat for Crotch's bumble bee due to its regular mowing as well as the sparse nature of this species' occurrence in the South Bay. As such, few, if any, Crotch's bumble bee individuals are expected to be present on the Trimble Substation Expansion Site when construction occurs. If construction activities were to result in the potential loss of individual Crotch's bumble bees, then Trimble Substation Expansion construction would impact only a small number of individuals and/or nests representing a very small proportion of the species' regional population. For these reasons, the Trimble Substation Expansion would not have a substantial adverse effect on Crotch's bumble bee since high-quality nesting and foraging habitat for this species exists in other regions of the Bay Area and the low probability of the species being present on the Site. **(Less than Significant Impact)**

Impacts on Burrowing Owls

Trimble Substation Expansion Site

No burrowing owls were observed during the June 2026 site visit to the Trimble Substation Expansion Site. A burrowing owl was found on the Site during previous site visits completed in February and March 2025; however, subsequent surveys in March 2025 and April 2025 found that the burrowing owl had left the Site. Burrowing owls have been known to nest in the San José Mineta Airport fields located southwest of the Site, but the last known occurrence was in 2015. While it can be stated there are no burrowing owls currently on the Site, the Site does contain suitable nesting/roosting (ground squirrel burrows) and foraging habitat for burrowing owls and they could occur on the Site in the future. As such, construction of the Trimble Substation Expansion could directly result in the loss of burrowing owls or cause them to abandon their burrows, both of which would be considered significant impacts under CEQA. The Project, however, would comply with Habitat Plan Condition 15, which requires the Project to implement preconstruction surveys, construction avoidance measures, and construction monitoring measures to protect burrowing owls prior and during construction.

In addition, construction of the Trimble Substation Expansion would result in the loss of approximately 8.3-acres of California annual grassland, which offers nesting/foraging habitat for burrowing owls. As discussed above, there are no known burrowing owl nests within 0.5-mile of the Site. The Habitat Plan includes specialty fees for projects that result in impacts to burrowing owl habitat; thus, the project will implement the following PDM to ensure compliance with the Habitat Plan.

PDM BIO-1: **Pay VHP Burrowing Owl Fees for Impacts on Occupied Nesting Habitat.** The project will pay applicable Santa Clara Valley Habitat Plan (Habitat Plan) burrowing owl fees for the areas of California annual grassland on the Trimble Substation Expansion Site that are permanently lost and located within 0.5-mile

of a burrow that has been used for nesting within the three years prior to the start of construction, as mapped in the Habitat Plan's burrowing owl fee zone or based on the results of the project's pre-activity surveys and other surveys regularly performed in the area.

The Trimble Substation Expansion would also add new structures to the Site which could provide perches for predatory raptors that prey on burrowing owls; however, there are already existing perches (i.e., transmission line poles, light poles, and trees) surrounding the Site and the inclusion of new perches is unlikely to result in increased predation.

Based on the above discussion, the Project, with implementation of PDM BIO-1 and compliance with Habitat Plan Condition 15, would have a less than significant impact on burrowing owls. **(Less than Significant Impact)**

Impacts on Nonbreeding Special-Status Species

Several special-status invertebrate, bird, and mammal species may occur on the CABGF/CADC and Trimble Substation Expansion Site as nonbreeding migrants, transients, or foragers, but they are not known or expected to breed or occur in large numbers within or near the project impact area. These are the monarch butterfly, tricolored blackbird, Bryant's savannah sparrow, grasshopper sparrow, yellow warbler, golden eagle, and pallid bat.

Construction of the CABGF/CADC and Trimble Substation Expansion would have some potential to impact foraging habitats and/or disturb individuals of these species. Construction activities might result in a temporary direct impact through the alteration of foraging patterns (e.g., avoidance of work sites because of increased noise and activity levels during maintenance activities) but would not result in the loss of individuals, as individuals of these species would fly away from any construction areas or equipment before they could be injured or killed. Further, the CABGF/CADC and Trimble Substation Expansion Sites do not provide important foraging habitat used regularly or by large numbers of individuals of any of these species. As a result, the Project would have little impact on these species' foraging habitat and no substantive impact on regional populations of these species. **(Less than Significant Impact)**

Impacts on White-tailed Kites

Trimble Substation Expansion Site

The white-tailed kite may nest in shrubs and trees on or adjacent to the Trimble Substation Expansion Site. Based on observations, the aerial extent of suitable habitats within and adjacent to the Site, and known nesting densities of these species, it is likely that no more than one pair of white-tailed kites could potentially nest on or adjacent to the Site. The Trimble Substation Expansion would result in the permanent loss of suitable nesting and foraging habitat for the white-tailed kite. In addition, activities that occur during the nesting season and cause a substantial

increase in noise or human activity near active nests may result in the abandonment of active nests. Heavy ground disturbance, noise, and vibrations caused by project activities could also potentially disturb nesting and foraging individuals and cause them to move away from work areas.

While the construction of the Trimble Substation Expansion would result in the permanent loss of suitable nesting and foraging habitat for the white-tailed kite and could cause the abandonment of active nests, the impact would be marginal since the number of individuals and nests that could be impacted would not affect the overall regional population number. Therefore, neither the potential loss of individuals nor the disturbance of nesting and foraging habitat would rise to the level of having a substantial adverse effect, and these impacts would thus not constitute a significant impact on these species or their habitat under CEQA. **(Less than Significant Impact)**

However, all native bird species are protected from direct take by federal and state statutes under provisions of the MBTA and CDFW code. The Project includes a PDM (refer to PDMs BIO-2.1 through BIO-2.6, below) that would require the project to either restrict work to the non-nesting season (September 1 through January 31) or conduct preconstruction surveys prior to project activities and maintaining appropriate buffers around active nests of protected birds.

PDM BIO-2.1: **Nesting Season Avoidance.** To the extent feasible, commencement of construction activities shall be scheduled to avoid the nesting season (September 1 through January 31, inclusive). If construction activities are scheduled to commence outside the nesting season, all impacts to nesting birds protected under the Migratory Bird Treaty Act ("MBTA") and California Fish and Game Code would be avoided. The nesting season for most birds in Santa Clara County extends from February 1 through August 31, inclusive.

PDM BIO-2.2: **Preconstruction Survey**. If it is not possible to schedule commencement of construction activities and/or tree removal between September 1 and January 31, preconstruction surveys for nesting birds shall be conducted by a qualified ornithologist to ensure that no nests shall be disturbed during project implementation. These surveys shall be conducted no more than 7 days prior to the initiation of demolition or construction activities or initiation of tree removal and pruning. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, ruderal grasslands, buildings) in and up 300 feet from the impact areas for nests.

PDM BIO-2.3: **Buffer zones**. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, ruderal grasslands, buildings) within 300 feet of the impact areas for nests. If active nests of protected species are found within project impact areas or close enough to these areas to affect breeding success, the ornithologist shall establish a species-specific work exclusion zone around each nest that shall be followed by the contractor. If an active nest is found within a distance that could result in

disturbance, the ornithologist shall establish a construction-free buffer zone (typically 300 feet for raptors and 100 feet for other bird species) to prevent nest disturbance. Established buffer zones shall remain in place until all young in the nest have fledged or the nest otherwise becomes inactive (e.g., due to predation). The buffer zone size may be reduced from established levels if supported with nest monitoring by a qualified ornithologist indicating that work activities outside the reduced radius would not impact the nest.

PDM BIO-2.4: **Buffer Monitoring**. Any buffer established under PDM BIO-2.3 shall be monitored on a frequency determined by the project ornithologist to verify compliance. After all young have fledged or the nest otherwise becomes inactive, as determined by the ornithologist, the buffer would no longer be required, and tree removal may occur. If an active bird nest is discovered during demolition or construction, then a buffer zone shall be established under the guidelines specified above.

PDM BIO-2.5: **Reporting.** A report detailing the survey findings and any required buffer zones shall be submitted to the Director of Planning, Building, and Code Enforcement or the Director's designee for review and approval prior to tree removal and the issuance of a grading or demolition permit. The report shall contain maps showing the location of all nests, species nesting, status of the nest (e.g., incubation of eggs, feeding of young, near fledging), and the buffer size around each nest (including reasoning behind any alterations to the initial buffer size). The report shall be provided within 10 days of completing a preconstruction nest survey.

PDM BIO-2.6: **Worker Environmental Awareness Program**. A qualified biologist shall be retained by the project owner/developer to conduct a Worker Environmental Awareness Program (WEAP) training focused on nesting bird protection for all construction personnel prior to the commencement of any ground disturbing activities during the nesting season. The training shall include a description of nesting bird species that may be encountered, regulatory protections under the Migratory Bird Treaty Act and California Fish and Game Code and other state and federal laws protecting birds, survey and buffer requirements during the nesting season, and proper protocols for reporting and avoiding impacts to active nests.

With implementation of PDM BIO-2.1 through BIO-2.6, impacts to the white-tailed kite and common nesting birds would be further reduced and impacts would be less than significant. **(Less than Significant Impact)**

Impacts Due to Bird Collisions and Electrocutions

Coyote Creek, located 0.4-mile to the northeast of the CABGF/CADC Site, and the Guadalupe River, located 0.5-mile southwest of the Trimble Substation Expansion Site, are important movement corridors for songbirds that migrate along the Pacific Flyway, and many migrant songbird species disperse and forage along Coyote Creek and the Guadalupe River in relatively large numbers. However, due to the intervening distance between the Sites and the waterways, as well as the lack of high-quality habitat for migrant birds (e.g., riparian and oak woodland habitat with dense canopy and understory layers) on or adjacent to the Sites, large numbers of migrant birds associated with Coyote Creek and the Guadalupe River are not expected to occur on the Sites. Further, the Sites are not situated in a landscape position in between two high-quality habitat areas such that large numbers of birds would be flying past the site over the long term. As a result, collisions by large numbers of migrant birds are not expected at the Sites.

In addition, the majority of the CABGF/CADC exterior would be composed of opaque insulated metal panels, with only a limited amount of glazing at the northwest corner of the Site. While the limited glazing could result in occasional bird collisions, only low numbers of resident birds use the Site, and due to the intervening distance between the Site and Coyote Creek, few migrant birds would be attracted to the Site over the long term. As a result, construction of the CABGF/CADC would not result in the mortality of large numbers of birds relative to the size of regional population, and this impact is considered less than significant.

The PG&E transmission line routes would add new electrical infrastructure to the Project area that could increase electrocution risk for migrant birds; however, PG&E would implement their Avian Protection Plan (see Section 4.4.1.1 above) to reduce impacts to a less than significant level. **(Less than Significant Impact)**

Impacts Due to Increased Lighting

Construction of the Project would result in new sources of light around the CABGF/CADC and Trimble Substation Expansion Sites. Sources would include light fixtures illuminating buildings, building architectural lighting, and parking lot and pedestrian lighting. Depending on the location, direction, and intensity of exterior lighting, this lighting could potentially spill into adjacent natural areas, thereby resulting in an increase in lighting compared to existing conditions. Except for the Trimble Substation Expansion Site itself and adjacent grassland areas to the southwest, the surrounding area is already developed with urban uses and habitat that does not support sensitive species that might be significantly impacted by illuminance from the CABGF/CADC or Trimble Substation Expansion. Lighting from the CABGF/CADC and Trimble Substation Expansion is not expected to spill past surrounding buildings to illuminate riparian habitats along Coyote Creek, 0.4-mile to the northeast, or Guadalupe River, 0.5-mile southwest. The wildlife species inhabiting the developed areas around the Sites are already habituated to the existing artificial illuminance from a variety of urban and natural light sources that are found nearby.

Lighting from the Trimble Substation Expansion Site, if uncontrolled, could illuminate grassland habitats that provide suitable habitat for burrowing owls located immediately southwest of the site. However, a number of existing lights are present immediately adjacent to the grassland habitat. These include approximately 15-foot-tall pole lights along the parking lot to the southeast and approximately 20-foot-tall pole lights along Component Drive and Orchard Parkway. These lights provide relatively high levels of existing ambient lighting on all sides of the grassland habitat southwest of the Trimble Substation Expansion Site and spill some lighting into the grassland habitat. Due to the relatively high levels of existing ambient lighting, construction of new lights on the Trimble Substation Expansion Site is unlikely to result in a substantial increase in ambient lighting within the adjacent grassland habitat. Nevertheless, because the Trimble Substation Expansion's lighting design is still being developed, the possibility that intense lighting may spill or be directed onto potential burrowing owl habitat in adjacent areas cannot be ruled out. Should the lighting design proposed by PG&E be determined by qualified biologists to result in a substantial increase in ambient light on adjacent grassland areas, the Project would implement the following PDM to ensure lighting impacts to burrowing owls, should they be present, are reduced to a less than significant level.

PDM BIO-3: **Minimize Project Lighting.** The Trimble Substation Expansion Site shall implement the following measures to minimize effects of project lighting on burrowing owls that could occupy undeveloped areas adjacent to the Trimble Expansion Site.

- Through a combination of proper fixture selection, low mounting height, glare shielding, and orientation/aiming of light fixtures, the design team shall actively control undesirable spill light towards sensitive habitat areas. All exterior lighting shall be fully shielded to block illumination from shining outward towards undeveloped habitats to the southwest of the Trimble Substation Expansion site, and to prevent the lit portions of these fixtures (i.e., the lamps) from being directed towards these areas.
- Outdoor lighting fixtures shall incorporate lamps with a Correlated Color Temperature of 2700 Kelvin or less.
- The allowed total initial luminaire lumens for the project site is 2.5 lumens per square foot of hardscape.
- The maximum allowed luminaire lumens (i.e., the initial lamp lumens for a lamp, multiplied by the number of lamps in the luminaire) for individual fixtures is limited as follows:
    - Unshielded luminaires at one entry per building: 420 lumens
    - Fully shielded luminaires: 1,260 lumens
    - Unshielded luminaires other than those at main entries: 315 lumens
    - Landscape luminaires: 1,050 lumens

- No shielded directional flood lighting is permitted.
- The BUG backlight and glare ratings of individual project fixtures shall comply with lighting zone LZ-1, Moderate Ambient, as follows:
    - BUG Backlight Rating: B3 more than two mounting heights from the southwest property line, B2 from one to less than two mounting heights from the property line and ideally oriented , B1 from 0.5–1 mounting heights from the property line and ideally oriented, and B0 less than 0.5 mounting height to the property line and ideally oriented.
    - BUG Glare Ratings: G1, or G0 for any luminaire that is not mounted with its backlight perpendicular to any property line within twice the mounting height of the luminaire location.

With implementation of PDM BIO-3, the impacts from increased lighting would be less than significant. **(Less than Significant Impact)**

Impacts due to Increased Noise Levels

Wildlife that occur on and near the Project Component Sites, including along Coyote Creek and the Guadalupe River, are acclimated to existing noise levels in surrounding urban areas of San José. During construction and post-construction data center and substation operation, noise levels in surrounding areas, including along Coyote Creek and the Guadalupe River, would increase. However, based on measured ambient noise levels in the surrounding area (an hourly average of 52–67 dBA with occasional peaks of up to 76 dBA), the proposed noise from data center operations (an hourly average of 54–69 dBA) and substation operations (an hourly average of 60 dBA) is similar to the range of current ambient noise levels experienced by wildlife in the surrounding area. While construction noise could reach levels of up to 85 dBA at a distance of 50 feet from the construction activities, the noise levels would drop off at a rate of about six dBA per doubling of the distance between the source and receptor. By the time the construction noise reaches Coyote Creek roughly 0.4 mile away, it would be no higher than 52 dBA, which is similar to existing ambient noise levels in the area. Further, construction activities would be limited to the hours of 6:00 a.m. to 10:00 p.m., those activities would implement standard measures to minimize noise, and shielding by buildings often results in lower construction noise levels at distant receptors.

While the Project would increase noise levels during construction and from future operation of the data center and substations, the noise levels anticipated from these activities would be similar to the existing noise that the Project Component Sites, Coyote Creek, and Guadalupe River are currently exposed to from existing sources. The Coyote Creek and Guadalupe Rivers corridors are also within a highly disturbed area with surrounding development operations and vehicles on roadways; therefore, these riparian corridors are exposed to a variety of noise sources. It is not anticipated that the wildlife that use these waterways would avoid or stop using the riparian habitat due to the temporary construction noise or the new operational noise (e.g., generator testing) since

they are acclimated to these noise levels. For these reasons, the Project would not generate new noise levels that wildlife on the Project Component Sites and along Coyote Creek and the Guadalupe River are not already acclimated to. Therefore, biological resource impacts due to noise generated from construction and/or operational activities on the site would be less than significant. **(Less than Significant Impact)**

Nitrogen Deposition Impacts

The Habitat Plan covers impacts from nitrogen deposition since increased NO_x emissions from new developments (e.g., vehicles) contribute effects of nitrogen deposition on serpentine grassland ecosystems. While the Project Component Sites have no serpentine grassland, the 351 new operational trips per day that would be generated from the CADC would emit more NO_x that could disperse and contribute to the nitrogen deposition impacts to serpentine habitat elsewhere in the Habitat Plan. The Trimble Substation Expansion would not generate any vehicle trips. To reduce the impacts of nitrogen deposition, the Habitat Plan includes an impact fee to mitigate airborne nitrogen deposition from covered activities. The amount of the fee is based on the number of new daily vehicle trips generated by a covered activity. The fee-per-vehicle-trip is a surrogate that captures the overall effects of a project, recognizing that vehicle trips are not the only source of a project's NO_x emissions. In other words, NO_x emissions from other sources such as industrial operations (including backup generator operation), are covered by the fee. The following PDM, based on the City's Standard Permit Condition, would ensure compliance with the Habitat Plan.

PDM BIO-4: **Santa Clara Valley Habitat Plan Nitrogen Deposition Fee**. Prior to the issuance of any demolition, grading, or tree removal permit (whichever occurs first), the Project shall pay Santa Clara Valley Habitat Plan nitrogen deposition fees applicable to new trips for the CADC. The Project Applicant shall submit the Santa Clara Valley Habitat Plan Coverage Screening Form to the Director of Planning, Building & Code Enforcement or the Director's designee for approval and payment of the nitrogen deposition fees prior to the issuance of a grading permit.

With PDM BIO-4, the Project would be required to pay the mandatory nitrogen deposition impact fee, which would reduce impacts related to Project's NO_x emissions in relation to biological resources. **(Less than Significant Impact)**

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

As mentioned in Section 4.4.1.2 Existing Conditions, there is no riparian habitat or sensitive natural community on the Project Component Sites. Coyote Creek is located 0.4-mile northeast of the CABGF/CADC Site and the Guadalupe River is located 0.5-mile southwest of the Trimble Substation

Expansion Site. The entirety of ground-disturbing impacts would occur outside of Coyote Creek and Guadalupe River habitat. Thus, the Project would have no impact on riparian habitat or sensitive natural communities. **(No Impact)**

c) Would the project have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means?

As mentioned in Section 4.4.1.2 Existing Conditions, the Project Component Sites do not contain wetland areas. Coyote Creek, located 0.4-mile northeast of the CABGF/CADC Site and the Guadalupe River, located 0.5-mile southwest of the Trimble Substation Expansion Site, are where Waters of the United States and State are present; however, the Project would not disturb or encroach into the waterways. Therefore, the proposed Project would not impact state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. **(No Impact)**

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

As mentioned in Section 4.4.1.2 Existing Conditions, the Project Component Sites do not provide well-defined movement pathways for animals on or through the Sites due to the density of development in the project region and the lack of continuous, well-vegetated pathways through the nearby urban areas. For these reasons, the project will not result in a significant impact on wildlife movement corridors. **(Less than Significant Impact)**

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As described in Section 4.4.1.2 Existing Conditions, the CABGF/CADC site contains 72 trees, 68 of which are ordinance-sized according to the City of San José's Municipal Code Title 13, Construction of the CABGF/CADC would result in the removal of 22 trees (19 ordinance-sized), which requires a Tree Removal Permit from the City of San José. The Project Applicant would be required to replace removed trees using the City's tree replacement ratios. The species of trees to be planted would be determined in consultation with the City Arborist and the Department of Planning, Building and Code Enforcement. The CABGF/CADC and Trimble Substation Expansion would be required to conform to the replacement requirements as identified in the Municipal Code Section 13.28.300, General Plan Policies MS-21.4, MS-21.5, MS-21.6 and CD-1.24 and City of San José Tree Removal Ordinance (Municipal Code Section 13.31.010 to 13.32.100). The City's Standard Permit Condition for tree planting would be implemented by the Project as a PDM.

PDM BIO-5: **Tree Removal Permit**. Prior to any tree removal, a tree removal permit shall be obtained from the City of San José. The removed trees would be replaced according to tree replacement ratios required by the City as outlined in Table 4.4-3.

Table 4.4-3: Tree Replacement Ratios

Circumference of Tree to be Removed	Replacement Ratio - Native	Replacement Ratio – Non-Native	Replacement Ratio - Orchard	Minimum Size of Each Replacement Tree**
38 inches or more	5:1*	4:1	3:1	15-gallon
19 up to 38 inches	3:1	2:1	none	15-gallon
Less than 19 inches	1:1	1:1	none	15-gallon

*x:x = tree replacement to tree loss ratio

Note: Trees greater than or equal to 38-inch circumference measured at 54 inches above natural grade shall not be removed unless a Tree Removal Permit, or equivalent, has been approved for the removal of such trees. For Multi-Family residential, Commercial, and Industrial properties, a permit is required for removal of trees of any size.

A 38-inch tree equals 12.1 inches in diameter.

** A 24-inch box replacement tree = two 15-gallon replacement trees

Single Family and Two-dwelling properties may replace trees at a ratio of 1:1.

- Prior to the issuance of building permit(s), the permittee shall pay Off-Site Tree Replacement Fee(s) to the City for off-site replacement trees in accordance with the City Council approved Fee Resolution in effect at the time of payment for any replacement trees that cannot be located on-site.
- If there is insufficient area on the Project Site to accommodate the required replacement trees, one or more of the following measures shall be implemented, to the satisfaction of the Director of Planning, Building and Code Enforcement or Director's designee. Changes to an approved landscape plan requires the issuance of a Permit Adjustment or Permit Amendment.
    - The size of a 15-gallon replacement tree may be increased to 24-inch box and count as two replacement trees to be planted on the Project Site.

- Pay Off-Site Tree Replacement Fee(s) to the City, prior to the issuance of building permit(s), in accordance with the City Council approved Fee Resolution in effect at the time of payment. The City will use the off-site tree replacement fee(s) to plant trees at alternative sites.

By conforming to the standard permit conditions through implementation of PDM BIO-5, the CABGF/CADC and Trimble Substation Expansion would meet all applicable tree removal and tree protection requirements set forth by the City of San José. **(Less than Significant Impact)**

The Trimble Substation Expansion Site contains two trees, one of which is considered ordinance-sized, which may be removed as part of the project. The PG&E transmission line routes may also require tree trimming or removal. However, utility projects under CPUC jurisdiction are not subject to local ordinances and, therefore, would not require tree removal permits through the City of San José. The Trimble Substation Expansion and PG&E transmission lines would not, therefore, conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The CABGF/CADC and Trimble Substation Expansion are covered activities under the Habitat Plan. As a result, the CABGF/CADC and Trimble Substation Expansion would be required to comply with the Habitat Plan conditions, which includes paying applicable Habitat Plan fees and/or complying with specific Habitat Plan conditions to reduce impacts to biological resources. The CABGF/CADC and Trimble Substation Expansion would be required to comply with the following applicable Habitat Plan Conditions:

- **Condition 1. Avoid Direct Impacts on Legally Protected Plant and Wildlife Species**: Several wildlife species that occur in the project vicinity are protected under state and federal laws. Some of these animal species are listed as fully protected under the California Fish and Game Code (e.g., the white-tailed kite), and eagles are protected under the Bald and Golden Eagle Protection Act. Further, all native bird species and their nests are protected under the MBTA and California Fish and Game Code. Actions conducted under the Habitat Plan must comply with the provisions of the MBTA and California Fish and Game Code.
- **Condition 3. Maintain Hydrologic Conditions and Protect Water Quality**: Condition 3 applies to all projects and identifies a set of programmatic BMPs, performance standards, and control measures to minimize increases of peak discharge of storm water and to reduce runoff of pollutants to protect water quality, including during project construction. These requirements include preconstruction, construction site, and post-construction actions.

Preconstruction conditions are site design planning approaches that protect water quality by preventing and reducing the adverse impacts of stormwater pollutants and increases in peak runoff rate and volume. They include hydrologic source control measures that focus on the protection of natural resources. Construction site conditions include source and treatment control measures to prevent pollutants from leaving the construction site and minimizing site erosion and local stream sedimentation during construction. Post-construction conditions include measures for stormwater treatment and flow control.

- **Condition 15**. **Western Burrowing Owl.** This condition applies to projects that contain suitable nesting and foraging habitat for burrowing owls. If a project contains suitable habitat, a qualified biologist must perform preconstruction surveys to ascertain the presence or absence of burrowing owls on the site. If burrowing owls are present on the site, projects must implement avoidance measures and construction monitoring. Passive relocation of owls may also be allowed.

Construction disturbance and project tree removal during the avian breeding season (February 1 through August 31 inclusive, for most species) could result in the incidental loss of eggs or nestlings, either directly through the destruction or disturbance of active nests or indirectly by causing the abandonment of nests. Because such an impact would conflict with Condition 1 of the Habitat Plan, it would be considered a significant impact under CEQA. As discussed under checklist question a), the Project includes PDMs (refer to PDMs BIO-2.1 through BIO-2.6) that would require the project to either restrict work to the non-nesting season (September 1 through January 31) or conduct preconstruction surveys prior to project activities and maintaining appropriate buffers around active nests of protected birds.

With compliance with the Habitat Plan Conditions and implementation of the PDMs that require payment of the nitrogen deposition Habitat Plan fee and nesting bird avoidance/surveys, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan. **(Less than Significant Impact)**

4.4.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative biological resources impact?

Cumulative impacts arise due to the linking of impacts from past, current, and reasonably foreseeable future projects in the region. Future development activities in San José and development activities covered by the Habitat Plan would result in impacts on the same habitat types and species that will be affected by the proposed project. The Project, in combination with other projects in the area and other activities that impact the species that are affected under the project, could contribute to cumulative effects on special-status species. Other projects in the area include both development and maintenance projects that could adversely affect these species and restoration projects that will benefit these species.

The cumulative impact on biological resources resulting from the Project in combination with other projects in the region would be dependent on the relative magnitude of adverse effects of these projects on biological resources compared to the relative benefit of impact avoidance and minimization efforts prescribed by (1) planning documents, CEQA mitigation measures, and permit requirements for each project; (2) compensatory mitigation and proactive conservation measures associated with each project; and (3) the benefits to biological resources accruing from the Habitat Plan. In the absence of such avoidance, minimization, compensatory mitigation, and conservation measures, cumulatively significant impacts on biological resources would occur.

The City's General Plan and the Habitat Plan include numerous conservation measures to offset adverse effects on covered activities. Many projects in the region that impact resources similar to those impacted by the proposed Project would be covered activities under the Habitat Plan and would mitigate impacts on sensitive habitats and many special-status species through that program, which will require payment of fees for habitat restoration. Furthermore, the Project would implement PDMs (refer to PDM BIO-1, PDM BIO-2.1 through 2.6, PDM BIO-3, and PDM BIO-4) to comply with the Habitat Plan and City Municipal Code, as described above. Therefore, the Project would not contribute to substantial cumulative effects on biological resources. **(Less than Significant Cumulative Impact)**

4.5 Cultural Resources

The discussion in this section is based in part on Cultural Resources Reports (CRR) prepared for the CABGF/CADC Site (May 2026) and Trimble Substation Expansion Site and PG&E Transmission Line Routes (August 2026) by Chronicle Heritage. Copies of these report will be docketed with the Commission under a Request for Confidentiality. In this report mitigation measures are recommended to reduce impacts. The Applicant has incorporated these recommendations into PDMs as discussed below.

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection of cultural resources is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

The NRHP is the nation's master inventory of historic resources that are considered significant at the national, state, or local level. The minimum criteria for determining NRHP eligibility include:

- The property is at least 50 years old (properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
- It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and
- It possesses at least one of the following characteristics:
    - Association with events that have made a significant contribution to the broad patterns of history;
    - Association with the lives of persons significant in the past;
    - Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction; or
    - Has yielded, or may yield, information important to prehistory or history.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.[47]

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Sections 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county

[47] California Office of Historic Preservation. "CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6." Accessed May 22,2024. http://www.ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf.

coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Regional

PG&E Bay Area Operations and Maintenance Incidental Take Permit Final Environmental Impact Report

Applicable measures from the Bay Area O&M FEIR that would reduce cultural resources impacts under CEQA are provided in Table 4.5-1 below.[48]

Table 4.5-1: Programmatic Measures from the PG&E Operations & Maintenance Incidental Take Permit FEIR for Cultural Resources Impacts

PG&E Programmatic Measures	Description of Measure
CR-1: Inventory, evaluate, and protect cultural resources	As part of the screening process described in Chapter 2, Project Description, PG&E will continue to review historical and archaeological resources that were previously recorded, as well as structures that meet the 50-year threshold throughout the 30-year duration of ITP. If any resources have the potential to be eligible for listing on the CRHR or NRHP, PG&E will determine whether project activities will affect the resources and, if the activities would cause a substantial adverse change in the resource, a qualified cultural specialist will coordinate with PG&E, the landowner, and CDFW on the appropriate steps for evaluation, protection, documentation and/or preservation of the resource.
CR-2 Provide worker training	The following procedures will be implemented prior to commencement of any project-related construction activities: All PG&E, contractor, and subcontractor project personnel will receive training regarding: • Appropriate work practices necessary to effectively implement the Applicant Proposed Measures (APMs) and to comply with the applicable environmental laws and regulations. • The potential for exposing subsurface cultural resources and paleontological resources. • How to recognize possible buried cultural and paleontological resources. • Site-specific physical conditions to improve hazard prevention and, if applicable, a review of the stormwater pollution prevention plan, which will also address spill response. • Contact information for the project (i.e., environmental planner who will reach out to the appropriate resource specialist, such as archaeologists, paleontologists, cultural monitors, or tribal monitors, as needed).

[48] California Department of Fish and Wildlife. *PG&E Bay Area O&M Incidental Take Permit Environmental Impact Report Volume 2. Final EIR.* June 2022

PG&E Programmatic Measures	Description of Measure
	This training will include a presentation of: • Procedures to be followed upon discovery or suspected discovery of historic or archaeological materials, including Native American remains and their treatment. • Procedures to be followed upon discovery or suspected discovery of paleontological resources. • Procedures to be followed for spill and other hazard prevention. • Actions that may be taken in the case of violation of applicable laws.
CR-3: Inadvertent discovery of previously unidentified cultural resources	The following procedure will be employed if a previously undocumented cultural resource is encountered during construction: • All work within 100 feet (30 meters) of the find will be halted or redirected by the construction foreman and protective barriers or flagging will be installed along with signage identifying the area as an "environmentally sensitive area." Entry into the area will be limited to PG&E-approved/qualified CRSs, PG&E, and other authorized personnel. • PG&E and the CPUC will be notified immediately. • A qualified archaeologist will document the resource and coordinate with PG&E, the landowner, and the CPUC on the appropriate steps for evaluation and preservation of the find. The level of effort will be based on the size and nature of the resource, as determined by the archeologist and approved by the CPUC. • No work will occur within the environmentally sensitive area until clearance has been granted by the archaeologist or PG&E and the CPUC. Environmentally sensitive area flagging and signage will only be removed when authorized by PG&E or the archaeologist and the CPUC.
CR-4: Discovery of human remains	The following procedures will be implemented in the event of the discovery of human remains, in compliance with California law, including, but not limited to, the following provisions: CEQA Guidelines Section 15064.5(e); Public Resources Code Sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code Section 7050.5: • Work in the immediate area within 100 feet of the find will be halted and the PG&E archaeologist, County Coroner, and CPUC will be notified immediately. Work will remain suspended until the Coroner can assess the remains. In the event the remains are determined to be precontact in origin, the Coroner will notify the NAHC within 24 hours, which will then identify an MLD. The MLD will consult with PG&E's archaeologist within 48 hours of notification to determine further treatment of the remains.
CR-5: Undiscovered potential tribal cultural resources	The following procedure will be employed (after stopping work and following the procedure for determining eligibility in APM CUL-2) if a resource is encountered and determined by the project's qualified archaeologist to be potentially eligible for the CRHR or a local register of historic resources and is associated with a California Native American Tribe(s) with a traditional and cultural affiliation with the geographic area of the proposed project:

PG&E Programmatic Measures	Description of Measure
	• The project's qualified archaeologist will notify the CPUC for appropriate action. PG&E will assist the CPUC if needed to identify the lead contact person for the California Native American Tribe(s) potentially associated with the cultural resource and with a traditional and cultural affiliation with the geographic area of the proposed project. The CPUC will contact the lead contact person to set up a meeting with PG&E and the CPUC. • The project's qualified archaeologist will participate with the CPUC in discussions with the California Native American Tribe(s) to determine whether the resource is a TCR as defined by Public Resources Code Section 21074, and the tribe(s)' preferred method of mitigation, if the resource is determined to be a TCR. If no agreement can be reached for mitigation after discussions with the California Native American Tribe(s) or it is determined that the tribe(s)' preferred mitigation is not feasible, PG&E will consult with the CPUC and implement one of the example mitigation measures listed in Public Resources Code Section 21084.3(b), or other feasible mitigation.

City of San José

Historic Preservation Ordinance

The City of San José Historic Preservation Ordinance (Chapter 13.48 of the Municipal Code) provides a framework for the City to identify, protect, and encourage the preservation of significant resources and foster civic pride in the City's cultural resources. The Historic Preservation Ordinance establishes processes for the designation of City Landmarks, City Landmark Districts and Conservation Areas, review of proposed exterior alterations to designated City Landmarks and properties within City Landmark Districts and Conservation Area, maintenance of a Historic Resources Inventory (HRI), and administration of Mills Act Contracts.

The City of San José also uses the significance criteria for City Landmark eligibility to evaluate properties that are 45 years or older that have not previously been determined to be a significant historical resource under CEQA (Discretionary Resource). Properties that meet the eligibility criteria for listing in the San José Historic Resources Inventory as a Candidate City Landmark have special historical, architectural, cultural, aesthetic, or engineering interest or value of a historical nature and are significant under at least one of the following criteria:

1. Its character, interest or value as a part of the local, regional, State or national history, heritage or culture
2. Its location as a site of a significant historic event
3. Its identification with a person or persons who significantly contributed to the local, regional, State or national culture and history

4. Its exemplification of the cultural, economic, social or historic heritage of the city of San José
5. Its portrayal of the environment of a group of people in an era of history characterized by a distinctive architectural style
6. Its embodiment of distinguishing characteristics of an architectural type or specimen
7. Its identification as the work of an architect or master builder whose individual work has influenced the development of the City of San José
8. Its embodiment of elements of architectural or engineering design, detail, materials or craftsmanship which represents a significant architectural innovation, or which is unique.

San José Historic Resources Inventory

Consistent with the City's Historic Preservation Ordinance, in 1975, the City developed an inventory of historically and architecturally significant structures. The inventory now includes approximately 4,000 properties, including designated City Landmarks and City Landmark Districts.

Envision San José 2040 General Plan

Various policies in the City's General Plan have been adopted for the purpose of reducing or avoiding impacts related to cultural resources. The following are applicable to the Project. The following cultural-resources-related General Plan policies are applicable to the Project.

Policy	Description
ER-10.1	For proposed development sites that have been identified as archaeologically or paleontologically sensitive, requiring investigation during the planning process in order to determine whether potentially significant archaeological or paleontological information may be affected by the project and then require, if needed, that appropriate mitigation measures be incorporated into project design.
ER-10.2	Recognizing that Native American human remains may be encountered at unexpected locations, impose a requirement on all development permits and tentative subdivision maps that upon discovery during construction, development activity will cease until professional archaeological examination confirms whether the burial is human. If the remains are determined to be Native American, applicable state laws shall be enforced.
ER-10.3	Ensure that City, State, and Federal historic preservation laws, regulations, and codes are enforced, including laws related to archaeological and paleontological resources to ensure that adequate protection of historic and pre-historic resources.

4.5.1.2 *Existing Conditions*

Archaeological Resources

Pre-Contact Resources

Native Americans occupied Santa Clara Valley and the greater Bay Area for more than 5,000 years. The exact time period of the Ohlone (originally referred to as Costanoan) migration into the Bay Area is debated by scholars. Dates of the migration range between 3,000 B.C. and 500 A.D. Regardless of the actual time frame of their initial occupation of the Bay Area and, in particular, Santa Clara Valley, it is known that the Ohlone had a well-established population of approximately 7,000 to 11,000 people with a territory that ranged from the San Francisco Peninsula and the East Bay south through the Santa Clara Valley and down to Monterey and San Juan Bautista.

A record search at the Northwest Information Center (NWIC) of the California Historical Resources Information Systems (CHRIS) and a literature review were completed to establish the archaeological sensitivity of the Project Component Sites for both Native American and historic-period archaeological resources. The record search for the CABGF/CADC Site, including a surrounding one-mile buffer, was submitted to NWIC on April 1, 2026. The record search identified 23 previously recorded resources within the requested search area. Of the 23 previously recorded resources, five are precontact sites and the rest are historical sites or built environment sites. The record search for the Trimble Substation Expansion Site and PG&E transmission line routes, including a surrounding one-mile buffer, was submitted to NWIC on July 24, 2026. The record search identified 10 previously recorded resources within the requested search area. Of the 10 previously recorded resources, three are precontact sites and the rest are historical sites or built environment sites.

Sacred Lands File (SLF) Search requests were also submitted to the Native American Heritage Commission (NAHC) for the Project Component Sites. Responses were received on April 7, 2026 and July 6, 2026 stating that the search results were positive, meaning a tribe has reported the presence of sacred lands within the search NAHC search radius.

Archaeological sites are most often found in flat locations with access to a perennial source of fresh water. Soils deposited during the Holocene era (since 11,700 years ago), especially young alluvium from the last 2,000-3,000 years, are more likely to contain buried archaeological deposits. In Santa Clara County, Native American sites are most often found within one-half mile of major watercourses and one-quarter mile of minor watercourses.

Pedestrian field surveys of the Project Component Sites were completed on March 31, 2026 and June 16, 2026. No precontact artifacts or features were observed during the field surveys.[49,50] However, given the close proximity to Coyote Creek, Guadalupe River, and the positive SLF Search, as well as its proximity to significant precontact archaeological sites, buried sediments within the

[49] Chronicle Heritage. *Cultural Resources Technical Report for the Charcot Data Center Project*. May 2026. Page 39.
[50] ---. *Cultural Resource Technical Report for the North San José Switching Station Project*. August 2026. Page 42.

Project area have a moderate to high potential for the presence of buried precontact cultural resources.[51,52]

Historic-Period Resources

Historic-period activities may also lead to the creation of archaeological features or deposits. These can include structural remains such as walls, foundations, cellars, or wells; or landscape features such as roads, levees, fence lines, ponds, dams, or embankments. Per historical and topographic maps, the first structures shown on the Project Component Sites were in 1876, and by 1897, several structures were identified on historical maps. Aerial images first cover the Project Component Sites beginning in 1931, which depict the sites covered in agricultural fields and farm roads. The sites remained agricultural land until 1963, when the first of the existing industrial buildings in the Project Area were constructed. The first industrial building on the CABGF/CADC Site was constructed in 1976. The pedestrian field survey did not identify any historic-period features or items. Based on the above, the Project Component Sites have low potential for the presence of historic-period resources.

Historical Resources

CABGF/CADC Site

Six historic-era properties were identified on the CABGF/CADC Site, located at 2140-2156 Zanker Road, 2118-2138 Zanker Road, 2070-2082 Zanker Road, 410 Charcot Avenue, 1901 Junction Avenue, 2250 Zanker Road. Additionally, the roads and street furniture (e.g., traffic signals, streetlights, signage poles, fire hydrants, etc.) surrounding the site along Zanker Road, Charcot Avenue, and E. Brokaw Road are from the historic era. All the properties and public infrastructure were constructed between 1958 and 1977 and are discussed in further detail below.

Historical Evaluation

The aforementioned structures and infrastructure elements were analyzed to determine if the resources were eligible for inclusion in the CRHR and the City of San José's Landmark Criteria. None of the resources have been previously listed under any local, State, or Federal historic resource designation criteria.

Based on the windshield survey of each property from the public right-of-way and a desktop review of available building permits, historical newspaper articles, and City of San José planning literature, the seven properties are typical examples of postwar industrial development. They lack documented association with significant events or persons, do not embody distinctive architectural characteristics, and do not possess demonstrated research potential. Therefore, the properties are not eligible for listing in the CRHR and are not historical resources for purposes of CEQA. DPR 523

[51] ---. *Cultural Resources Technical Report for the Charcot Data Center Project*. May 2026. Page 58.
[52] ---. *Cultural Resource Technical Report for the North San José Switching Station Project*. August 2026. Page 162.

forms for each of the six building structures have been drafted and are appended to the Cultural Resources Technical Reports prepared for the Project.

Trimble Substation Expansion Site and PG&E Transmission Line Routes

A pedestrian survey to evaluate the built environment in the vicinity of the Trimble Substation Expansion Site and the PG&E transmission line route was completed on June 16, 2026. There are no built environment resources on either the Trimble Substation Expansion Site or within the disturbance areas of the PG&E transmission line route.

The pedestrian survey identified 34 historic-era properties in the Project Area, located along Zanker Road, N. First Street, Component Drive, Charcot Avenue, E. Brokaw Road, and Bering Drive. The properties were built between 1973 and 1981 and are discussed in further detail below.

Historical Evaluation

The aforementioned structures were analyzed to determine if the resources were eligible for inclusion in the CRHR and the City of San José's Landmark Criteria. None of the resources have been previously listed under any local, State, or Federal historic resource designation criteria.

Based on the windshield survey of each property from the public right-of-way and a desktop review of available building permits, historical newspaper articles, and City of San José planning literature, the 34 properties are typical examples of postwar industrial development. They lack documented association with significant events or persons, do not embody distinctive architectural characteristics, and do not possess demonstrated research potential. Therefore, the properties are not eligible for listing in the CRHR and are not historical resources for purposes of CEQA. DPR 523 forms for each of the 34 building structures have been drafted and are appended to the Cultural Resources Technical Reports prepared for the Project.

4.5.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
k) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☒	☐
l) Cause a substantial adverse change in the significance of an archaeological resource as pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☒	☐
m) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
Would the project result in a cumulatively considerable contribution to a significant cumulative cultural resources impact?	☐	☐	☒	☐

4.5.2.1 *Project Impacts*

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

Pursuant to CEQA Guidelines Section 15064.5 (b)(1), a "substantial adverse change" in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

As described in Section 4.5.1.2 Existing Conditions, the Project Component Sites do not contain historic resources or properties eligible for listing on the federal, state, or local inventories. There are also no historical resources present within the surrounding area as the existing structures within the one-parcel buffer are not eligible for listing on the NRHP or CRHR. Furthermore, the Sites are not located within a historic district, and the proposed development would not detract from the historical significance of any nearby historic structures through incompatible land uses or design. For these reasons, the Project would not cause a substantial adverse change in the significance of a historical resource. **(Less than Significant Impact)**

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

As described in Section 4.5.1.2 Existing Conditions, the Project Component Sites have moderate to high sensitivity for archaeological resources (including Native American resources).

The Project would require grading and/or subsurface work during construction, which increases the potential of encountering an unknown subsurface archaeological resource.

In accordance with the recommendations of the site-specific archaeological resources report, the following PDM will be implemented by the Project on the Project Component Sites to reduce impacts to subsurface archaeological resources.

PDM CUL-1.1 **Worker Environmental Awareness Program***.* Prior to the commencement of construction, the Project Applicant shall secure the services of a qualified archaeologist and Native American monitors. The qualified archaeologist shall prepare a workforce environmental awareness program (WEAP), in coordination with the Native American monitor, to instruct construction workers of the obligation to protect and preserve valuable archaeological and Native American resources for review and approval by the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee. This program shall be provided to all construction workers via a recorded presentation and shall include a discussion of applicable laws and penalties under the laws; samples or visual aids of resources that could be encountered in the project vicinity; instructions regarding the need to halt work in the vicinity of any potential archaeological and Native American resources encountered; and measures to for construction workers to notify their supervisor, the applicant, and the qualified archeologist, and the Native American monitor. The Project Applicant shall submit the qualifications of the qualified archaeologist and Native American monitor, as well as an electronic copy of the WEAP to the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee.

PDM CUL-1.2: **Construction Monitoring and Protection Measures**. The Project Applicant shall secure the services of Native American and archaeological monitors to observe excavations of the native soils that underlie disturbed and fill dirt at the project site. The Native American monitor shall be selected based on the following:

- Traditional ties to the area being monitored.
- Knowledge of local Native American village sites.
- Knowledge and understanding of Health and Safety Code, section 7050.5, and Public Resources Code, section 5097.9 et seq.
- Ability to effectively communicate the requirements of Health and Safety Code, section 7050.5, and Public Resources Code, section 5097.9 et seq.
- Ability to work with law enforcement officials and the Native American Heritage Commission to ensure the return of all associated grave goods taken from a Native American grave during excavation.
- Ability to travel to project sites within traditional tribal territory.
- Ability to secure replacement monitors when needed for scheduling conflicts.
- Knowledge and understanding of Title 14, California Code of Regulations, section 15064.5.

- Ability to advocate for the preservation in place of Native American cultural features through knowledge and understanding of CEQA mitigation provisions.
- Ability to read a topographical map and be able to locate site and reburial locations for future inclusions in the Native American Heritage Commission's Sacred Lands Inventory.
- Knowledge and understanding of archaeological practices, including the phases of archaeological investigation.

The qualified archaeologist and Native American monitor shall have authority to halt construction activities temporarily in the immediate vicinity of an unanticipated find in accordance with applicable law and regulations. If, for any reasons, the qualified archaeologist or qualified Native American monitor are not present but construction crews encounter a cultural resource, then all work shall stop temporarily within 50 feet of the find until a qualified archaeologist in consultation with a qualified Native American monitor, have been contacted to determine the proper course of action. The City of San José's Director of Planning, Building and Code Enforcement or the Director's designee shall be notified of any finds during the grading or other construction activities.

PDM CUL-1.3: **Undiscovered Archaeological Resources***.* If archaeological resources are encountered during excavation or grading of the site, all activity within a 50-foot radius of the find shall be stopped, the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee shall be notified, and a qualified archaeologist shall examine the find. Work shall be allowed to continue outside of the 50-foot buffer area. The qualified archaeologist and Native American monitors shall evaluate the find to determine if they meet the definition of a historical, unique archaeological, or tribal cultural resource and make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits for any construction occurring within the above-referenced 50-foot radius. If the finds do not meet the definition of a historical, unique archaeological, or tribal cultural resource, no further study or protection is necessary prior to project implementation. If the find does meet the definition of a historical, unique archaeological, or tribal cultural resource, then it shall be avoided by project activities. If avoidance is not feasible, adverse effects to such resources shall be mitigated in accordance with the recommendations of the archaeological and Native American monitors. Recommendations may include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery shall be submitted to the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee, Native American Heritage Commission (tribal cultural

resources), and the Northwest Information Center prior to issuance of the certificate of occupancy.

The Project Applicant shall ensure that construction personnel do not collect or move any cultural material and shall ensure that any fill soil that may be used for construction purposes does not contain any archaeological materials.

With implementation of PDM CUL-1.1 through PDM CUL-1.3, impacts to unrecorded subsurface cultural resources on the CABGF/CADC Site and Trimble Substation Expansion Site would be less than significant.

Because the PG&E transmission line would be covered under PG&E's O&M FEIR, they would not be subject to the PDMs identified above. Instead, to reduce the impacts to undiscovered archaeological resources, PG&E would be required to implement the following measures for the transmission lines and transmission tower:

- PG&E Programmatic Measures: CR-1, CR-2, CR-3, CR-4, and CR-5 (refer to Table 4.5-1)

With implementation of the above PG&E programmatic measures, the impact on archeological resources resulting from the proposed PG&E transmission line would be less than significant.

As documented above, with the implementation of PDM CUL-1.1 through PDM CUL-1.3 and PG&E's Programmatic Measures CR-1, CR-2, CR-3, CR-4, and CR-5, impacts to unrecorded subsurface cultural resources would be less than significant. **(Less than Significant Impact)**

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

The CABGF/CADC Site and Trimble Substation Expansion Site would involve substantial grading and subsurface work during construction, which could result in the discovery of previously unknown burials. Therefore, in the unlikely event that human remains are encountered, the proposed Project would be required to comply with the following PDM, which is based on City of San José standard permit conditions.

PDM CUL-2: **Stop Work for Human Remains**. If human remains are discovered during excavation or grading of the site, all activity within a 50-foot radius of the find shall be stopped. The Santa Clara County Coroner shall be notified immediately and will determine whether the remains are of Native American origin or an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of the identification. Once the NAHC

identifies the most likely descendant(s) (MLD), the MLD(s) will make recommendations regarding proper treatment or disposal, with appropriate dignity, of the human remains and any associated grave goods), which will be implemented in accordance with section 15064.5(e) of the California Code of Regulations, Title 14. The qualified archaeologist shall recover scientifically valuable information, as appropriate and in accordance with the recommendations of the MLD. A report of findings documenting any data recovery shall be submitted to the City of San José Director of Planning, Building and Code Enforcement or the Director's designee, the Northwest Information Center, and the MLD.

Through compliance with the PDM above, the proposed Project would properly handle findings of undiscovered human remains at the CABGF/CADC Site and Trimble Substation Expansion Site and this would reduce any impacts to a less than significant level.

There is also the potential to encounter human remains during excavation for the PG&E transmission line. Consistent with the O&M FEIR, the Project would be required to comply with PG&E programmatic measure CR-4 to stop work if human remains are found and have the coroner identify the remains, which will determine next steps. With implementation of PG&E programmatic measure CR-4, the proposed PG&E transmission line would result in a less than significant impact on human remains.

With the implementation of PDM CUL-2 for the CABGF/CADC and Trimble Substation Expansion Sites and PG&E's compliance with programmatic measure CR-4 for the transmission line, the Project would have a less than significant impact on human remains, including those interred outside of dedicated cemeteries. **(Less than Significant Impact)**

4.5.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative cultural resources impact?

The geographic area for cultural resources is the Project Component Sites and adjacent parcels as cultural resource impacts are typically localized and generally limited to the immediate area in which a given cultural resource is located. The cumulative projects may require excavation and grading or other activities that may affect unknown prehistoric cultural resources and/or historic resources. Other projects in the City of San José may also have cultural resources, irrespective of their designation as such on local, state, or federal registers. Any excavation or grading activities could affect these known and unknown cultural resources. Therefore, the City has adopted standard conditions that will be implemented by all projects to reduce potential impacts to cultural

resources. Project-level analyses will determine the necessity of additional mitigation measures to reduce localized and site-specific impacts to these resources.

Historic Resources

As discussed above, the Project Components Sites are not classified as a historic resource nor are the sites eligible to be listed on the CRHR nor the NRHP. The PG&E transmission line routes are primarily located within the public right-of-way along Zanker Road, Charcot Avenue, E. Brokaw Road, Component Drive, and N. First Street. For these reasons, the Project would not contribute to a significant cumulative impact on historic resources. **(Less than Significant Cumulative Impact)**

Archaeological Resources

The cumulative projects (including the proposed Project) would be required to implement General Plan policies and the City of San José's standard permit conditions to reduce impacts to archaeological resources (if encountered) to a less than significant level. The Project includes PDMs CUL-1.1 through CUL-1.3 to ensure the proposed development does not impact prehistoric or historic resources. As concluded in the General Plan Final Program EIR, future development under the General Plan, in conformance with existing policies and regulations, would not result in significant cumulative impacts to archaeological resources.[53] Cumulative PG&E infrastructure projects would adhere to PG&E's Programmatic Measures: CR-1, CR-2, CR-3, CR-4, and CR-5 to reduce impacts to archaeological resources. **(Less than Significant Cumulative Impact)**

Human Remains

Build out of the General Plan, including the proposed Project and cumulative projects, would be required to implement General Plan policy ER-10.2 to reduce impacts to human remains (if encountered) to a less than significant level (refer to PDM CUL-2). Therefore, the City has adopted standard conditions that will be implemented by all projects to ensure if human remains are discovered during earthwork activities then the remains would be handled properly and to limit disturbance. As concluded in the General Plan EIR, future development under the General Plan, in conformance with existing policies and regulations, would not result in significant cumulative impacts to human remains.[54] Cumulative PG&E infrastructure projects would adhere to PG&E's Programmatic Measures APM CR-4 to reduce impacts to human remains. **(Less than Significant Cumulative Impact)**

[53] City of San José. *Integrated Final Program Environmental Impact Report for the Envision San José 2040 General Plan. SCH# 2009072096.* September 2011
[54] Ibid.

4.6 Energy

4.6.1 Environmental Setting

4.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. Governor Schwarzenegger issued Executive Order (EO) S-3-05, requiring statewide emissions reductions to 80 percent below 1990 levels by 2050. In 2008, EO S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved on September 16, 2022, and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the scoping plan, identify and recommend measures to achieve these policy goals, and implement strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

California Building Standards Code

The California Building Standards Code (CBSC) is Title 24 of the California Code of Regulations. The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The California Energy Code is overseen by the California Energy Commission and includes design requirements to conserve energy in new residential and non-residential developments. The California Energy Code is enforced and verified by cities during the planning and building permit process. Title 24, Part 11 of the CBSC, also known as CALGreen, establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Title 24 is updated approximately every three years.[55,56] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars II program in 2022 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2026 through 2035. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.[57]

Regional and Local

Climate Smart San José

Climate Smart San José is a plan to reduce air pollution, save water, and create a stronger and healthier community. The City approved goals and milestones in February 2018 to ensure the City can substantially reduce GHG emissions through reaching the following goals and milestones:

- All new residential buildings will be Zero Net Carbon Emissions (ZNE) by 2020 and all new commercial buildings will be ZNE by 2030 (Note that ZNE buildings would be all electric with a carbon-free electricity source).
- San José Clean Energy (SJCE) will provide 100-percent carbon-free base power by 2021.

[55] Refer to https://www.dgs.ca.gov/bsc/codes.
[56] After passage of Assembly Bill 130, the residential building code is frozen until June 2031. This does not apply to nonresidential codes.
[57] California Air Resources Board. "Advanced Clean Cars II." Accessed March 12, 2026. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii.

- One gigawatt of solar power will be installed in San Jose by 2040.
- 61 percent of passenger vehicles will be powered by electricity by 2030.

City of San José Reach Building Code

In 2019, the San José City Council approved Ordinance No. 30311 and adopted the Reach Code Ordinance (Reach Code) to reduce energy related GHG emissions consistent with the goals of Climate Smart San José. The Reach Code applies to new construction projects in San José.

City of San José Municipal Code

The City's Municipal Code includes regulations associated with energy efficiency and energy use. City regulations include a Green Building Ordinance (Chapter 17.84) to foster practices to minimize the use and waste of energy, water and other resources in the City of San José, Water Efficient Landscape Standards for New and Rehabilitated Landscaping (Chapter 15.10), requirements for Transportation Demand Programs for employers with more than 100 employees (Chapter 11.105), and a Construction and Demolition Division Deposit Program that fosters recycling of construction and demolition materials (Chapter 9.10).

Envision San José 2040 General Plan

The General Plan includes the following energy policies applicable to the proposed Project.

Policy	Description
MS-2.3	Utilize solar orientation, (i.e., building placement), landscaping, design, and construction techniques for new construction to minimize energy consumption.
MS-2.11	Require new development to incorporate green building practices, including those required by the Green Building Ordinance. Specifically target reduced energy use through construction techniques (e.g., design of building envelopes and systems to maximize energy performance), through architectural design (e.g., design to maximize cross ventilation and interior daylight) and through site design techniques (e.g., orienting buildings on sites to maximize the effectiveness of passive solar design).
MS-3.1	Require water-efficient landscaping, which conforms to the State's Model Water Efficient Landscape Ordinance, for all new commercial, institutional, industrial, and developer installed residential development unless for recreation or other area functions.
MS-5.5	Maximize recycling and composting from all residents, businesses, and institutions in the City.
MS-6.5	Reduce the amount of waste disposed in landfills through waste prevention, reuse, and recycling of materials at venues, facilities, and special events.

4.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 6,014 trillion British thermal units (Btu) in the year 2023, the most recent year for which this data was available. Out of the 50 states, California is ranked second in total energy consumption after Texas but 47th in its per capita energy consumption. The breakdown by sector was approximately 781 trillion Btu (13 percent) consumed by the commercial sector, 890 trillion Btu (15 percent) consumed by the residential sector, 1,313 trillion Btu (22 percent) consumed by the industrial sector, and 3,030 trillion Btu (50 percent) consumed by the transportation sector. This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power. [58]

Electricity

California's total system electric generation (which includes imports) in 2024 was approximately 278,338 gigawatt hours (GWh), which was a reduction of approximately less than one percent from the 2023 electric generation of 281,140 GWh.[59,60] In 2024, renewable/greenhouse gas (GHG) free sources of energy were the largest source of California's power mix at approximately 62 percent and thermal sources accounting for the remaining 38 percent.[61]

In 2024, Santa Clara County consumed a total of 17,794 GWh of electricity with the residential sector consuming approximately 4,273 GWh (24 percent) and non-residential consuming approximately 13,521 (76 percent) of the total electricity.[62]

San José Clean Energy (SJCE) is the electricity provider for residents and businesses in the City of San José. SJCE sources the electricity and the Pacific Gas and Electric Company (PG&E) delivers it to customers over their existing utility lines. SJCE customers are automatically enrolled in the GreenSource program, which provides 62 percent GHG emission-free electricity. Customers can choose to enroll in SJCE's TotalGreen program at any time to receive 100 percent GHG emission-free electricity from entirely renewable sources.[63]

Fuel for Motor Vehicles

In 2024, an estimated 13,423 millions of gallons of gasoline and approximately 2,212 millions of gallons of diesel was consumed by vehicles in California. In Santa Clara County, approximately 547

[58] United States Energy Information Administration. "California State Energy Profile." Accessed March 12, 2026. https://www.eia.gov/states/CA/overview.
[59] California Energy Commission. "2024 Total System Electric Generation. Accessed March 12, 2026. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2024-total-system-electric-generation.
[60] California Energy Commission. "2023 Total System Electric Generation. Accessed March 12, 2026. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2023-total-system-electric-generation.
[61] California Energy Commission. "2024 Total System Electric Generation. Accessed March 12, 2026. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2024-total-system-electric-generation.
[62] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed March 12, 2026. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0.
[63] San José Clean Energy. "Your Choices." Accessed March 12, 2026. https://sanjosecleanenergy.org/your-choices/#top.

millions of gallons of gasoline and approximately 54 millions of gallons of diesel was consumed by vehicles.[64] The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 27.2 mpg in 2024, which is a record high.[65] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in June 2024 to require all cars and light duty trucks achieve an overall industry average fuel economy of 50.4 mpg by model year 2031.[66]

4.6.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
c) Result in a substantial increase in demand upon energy resources in relation to projected supplies?	☐	☐	☒	☐
Would the project result in a cumulatively considerable contribution to a significant cumulative energy impact?	☐	☐	☒	☐

[64] California Energy Commission. "2010-2024 California Annual Retail Fuel Outlet Report Results (CEC-A15) Energy Assessments Division." August 26, 2025. Accessed March 12, 2026. https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting.

[65] United States Environmental Protection Agency. "The 2025 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." February 2026. Accessed March 12, 2026. https://www.epa.gov/automotive-trends/download-automotive-trends-report#Full-Report.

[66] United States Department of Transportation. "USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2027-2031." June 7, 2024. Accessed March 12, 2026. https://www.transportation.gov/briefing-room/usdot-finalizes-new-fuel-economy-standards-model-years-2027-2031.

4.6.2.1 *Project Impacts*

a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction

Construction of the Project Components would require energy for the manufacturing and transportation of building materials, preparation of the Project Components Sites, use of construction equipment, and the construction of buildings and related improvements. Construction energy usage is temporary and would not result in excessive energy consumption because construction processes are generally designed to be efficient to avoid excess monetary costs. The Project would also be constructed in an urbanized area with close access to roadways, construction supplies, and workers, making the Project more efficient than construction occurring in outlying, more isolated areas. Thus, the construction process is already efficient and opportunities for increasing energy efficiency during construction are limited.

Furthermore, construction of the CABGF/CADC and Trimble Substation Expansion would require construction workers to implement best management practices to reduce fugitive dust and exhaust emissions (refer to PDM AIR-1 in Section 4.3 Air Quality), which would, among other things, restrict unnecessary idling of construction equipment and requires the applicant to post signs on the CABGF/CADC and Trimble Substation Expansion Sites reminding workers to shut off idle equipment. These best management practices would reduce the potential for energy waste. Furthermore, pursuant with General Plan Policy MS-14.3 and MS-2.11, the applicant of the CABGF/CADC Project would be required to implement the City's Green Building Policies to ensure that construction of the Project meets industry best practices and techniques are applied to maximize energy performance at the construction stage. The City's Zero Waste Strategic Plan would be implemented at a project level to enhance construction and demolition debris recycling, thus increasing diversion from landfills and further contributing to the energy efficiency of the CABGF/CADC construction activities.

For the proposed transmission line routes, PG&E would implement the following best management practices from the O&M FEIR[67]:

- Encourage workers to carpool to the job site to the extent feasible for large jobs. The ability to develop an effective carpool program for the project will depend upon the proximity of carpool facilities to the area, the geographical commute departure points of construction workers, and the extent to which carpooling will not adversely affect worker arrival time and the project's schedule.

[67] California Department of Fish and Wildlife. *PG&E Bay Area O&M Incidental Take Permit Environmental Impact Report Volume 2*. Final EIR. June 2022. Page 3.3-9

- Minimize unnecessary vehicle idling time. The ability to limit vehicle idling time will depend on the sequence of activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for use following start-up. Where such diesel-powered vehicles are required for repetitive tasks, these vehicles may require more idling time. The crews apply a "common sense" approach to vehicle use, so that idling is reduced as far as possible below the maximum of 5 consecutive minutes allowed by California law; if a vehicle is not required for use immediately or continuously, its engine will be shut off.
- Maintain equipment in proper working conditions in accordance with PG&E standards.
- Minimize equipment exhaust by using low-emission or electric equipment where feasible. Portable diesel-fueled construction equipment with engines 50 horsepower or larger and manufactured in 2000 or later are registered under the CARB Statewide Portable Equipment Registration Program.
- Minimize welding and cutting by using compression of mechanical applications where practical and within standards.
- Encourage use of natural gas or electric powered vehicles for passenger cars and light-duty trucks where feasible and available.
- Encourage the recycling of waste where feasible.

For the reasons described above, the proposed Project would result in less than significant construction-related impacts due to the aforementioned regulatory measures that are required to be implemented. **(Less than Significant Impact)**

Operation

CABGF/CADC

Operation of the data center building and related infrastructure would consume energy for multiple purposes including, but not limited to, building cooling, lighting, appliances, and electronics. Energy would also be consumed during each vehicle trip generated by employees and visitors. The CABGF/CADC would be designed and constructed in compliance with Title 24 and CALGreen standards and would include green building measures to reduce energy consumption. Design features such as water-efficient landscaping and ultra-low flow plumbing fixtures in the building would be implemented to limit water consumption to the extent feasible. The CADC would meet LEED Silver criteria. Other than the proposed emergency backup generators, the CABGF/CADC would be designed to be 100 percent electric. Due to the energy efficiency measures incorporated into the Project, it would not result in a wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources.

Power Usage Effectiveness, or PUE, is a metric used to compare the efficiency of facilities that house computer servers. PUE is defined as the ratio of total facility energy use to Information Technology (IT) (i.e., server) power draw (e.g., PUE = Total Facility Source Energy/ IT Source Energy).

For example, a PUE of two, means that the data center or laboratory must draw two watts of electricity for every one watt of power consumed by the IT/server equipment. It is equal to the total energy consumption of a data center (for all fuels) divided by the energy consumption used for the IT equipment. The ideal PUE is one where all power drawn by the facility goes to the IT infrastructure. Based on industry surveys, the 2024 average PUE for data centers was 1.56 with larger data center facilities being more efficient due to new technology.[68] The average annual PUE of the data center proposed by the Project would be 1.29[69], and the peak PUE would be 1.43.[70] Due to the energy efficiency of the data center operation, with a PUE well below industry average, it would not result in wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources.

Energy would also be consumed by the Project during regular testing and maintenance of the 44 emergency backup generators. As shown in Table 4.3-15, assuming all the generators are operated for testing and maintenance testing for a total of 50 hours annually, total annual fuel consumption would be 439,160 gallons (or 10,456 barrels). As described in PDM GHG-2 in Section 4.8 Greenhouse Gases, the Project would use renewable diesel fuel for the diesel-fired generators to the extent feasible to further reduce the Project's consumption on non-renewable resources. Therefore, the project's fuel usage for the emergency generators was compared to the supply and demand for renewable diesel fuel.

In 2024, approximately 76,054 million barrels of renewable diesel fuel was produced domestically and 12,394 million barrels were imported for a total supply of 88,448 million barrels.[71] Approximately 87,395 million barrels of renewable diesel fuel were consumed in the United States.[72] Based on the amount of renewable diesel fuel available and the amount consumed, there is a remainder of 1,053 million barrels of renewable diesel available. The CABGF/CADC would result in a slight increase in demand for renewable diesel fuel (less than 0.01 percent). This would not be a substantial increase upon energy resources and there would be adequate renewable diesel supplies to serve the Project. Additionally, since the generators would only be operated when necessary for maintenance and testing, and would not be used regularly for electricity generation, the Project would not result in a wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources. **(Less than Significant Impact)**

Trimble Substation Expansion and PG&E Transmission Lines

The Trimble Substation Expansion and PG&E transmission lines would not result in a wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources during operation since the electrical infrastructure would convert and distribute electricity instead of

[68] Uptime Institute. "Uptime Institute Global Data Center Survey 2024." July 2024. Accessed March 12, 2026. https://datacenter.uptimeinstitute.com/rs/711-RIA-145/images/2024.GlobalDataCenterSurvey.Report.pdf
[69] Total 89.3 MW demand of the CADC average conditions divided by 69.2 MW Design Critical IT Load
[70] Total 99 MW demand of the CADC on Worst Case Day divided by 69.2 MW Total Critical IT Load
[71] United States Energy Information Administration. "10. Renewable Energy." February 24, 2026. Table 10.4b Renewable Diesel Fuel Overview. https://www.eia.gov/totalenergy/data/monthly/pdf/sec10.pdf
[72] Ibid.

consuming it. Therefore, the Trimble Substation Expansion and PG&E transmission lines would result in less than significant operational energy impacts. **(Less than Significant Impact)**

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Statewide energy efficiency and renewable energy goals are set forth in the California Renewables Portfolio Standard Program, which is one of California's key programs for advancing renewable energy. The Commission verifies the eligibility of renewable energy procured by all entities serving retail sales of electricity in California, as these entities are obligated to participate and report energy portfolios to the Commission to comply with the Renewables Portfolio Standard Program.[73] Electricity would be provided to the Project by SJCE or a similar provider (e.g., PG&E) from sources of renewable and carbon-free power including wind, solar, geothermal, and hydroelectric. SJCE and PG&E are subject to verification by the Commission as an electricity-providing entity. By sourcing electricity from SJCE or PG&E, the Project would be compliant with statewide energy goals as set forth in the California Renewables Portfolio Standard Program.

In addition, the proposed CADC would be required to comply with various local policies and regulations adopted to improve energy efficiency in new developments and increase utilization of renewable energy sources, including the City's Green Building Program, Private Sector Green Building Policy, Greenhouse Gas Reduction Strategy, Climate Smart San José, Reach Code and General Plan energy policies. Implementation of applicable local policies and regulations would ensure the Project is compliant with regional and statewide energy efficiency and renewable energy plans and policies, such as the California Public Utilities Commission's California Long Term Energy Efficiency Strategic Plan (General Plan Policy MS-14.3), the Model Water Efficient Landscape Ordinance (General Plan Policy MS-3.1), and CALGreen (City of San José Building Code). By adhering to adopted policies and regulations and sourcing electricity from SJCE or PG&E, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

c) Would the project result in a substantial increase in demand upon energy resources in relation to projected supplies?

The Commission provides new forecasts for electricity demand every two years as part of the Integrated Energy Policy Report process. According to the 2024 Integrated Energy Policy Report Update, which is the latest adopted integrated energy policy report, statewide electricity consumption was more than 276,000 GWh in 2023, which is primarily due to the growth of data center load. Consumption is projected to reach approximately 401,000 GWh in the high baseline used in the local reliability scenario. Demand forecasts for planning purposes use multiple

[73] California Energy Commission. "Renewables Portfolio Standard – Verification and Compliance." Accessed March 12, 2026. https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard

scenarios, taking into account potential savings in different sectors, expected technological improvements, government mandates, and other factors.

The proposed CADC would have a maximum electricity demand of approximately 867,240 MWh per year if the Project were to operate at maximum capacity at all times.[74] The maximum Project electricity demand load would comprise a very small fraction of the expected statewide electricity consumption. In addition, while the CABGF/CADC would contribute to more electricity consumption, the proposed Project would be designed for energy efficiency and conservation in accordance with applicable provisions of the City's Green Building Program, Climate Smart San José goals and actions, and GHG Reduction Strategy. In addition, the use of renewable diesel fuel for the emergency generators, as discussed above in checklist question a), would also represent a fraction of the expected statewide renewable diesel fuel consumption. Therefore, the CADC would not result in a substantial increase in demand for energy resources relative to projected supplies. Impacts would be less than significant. **(Less than Significant Impact)**

Trimble Substation Expansion and PG&E Transmission Lines

The Trimble Substation Expansion and PG&E transmission lines are infrastructure that convert and distribute electricity instead of consuming it. Therefore, the PG&E infrastructure would have no impact on the demand or supplies of energy resources. **(No Impact)**

4.6.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative energy impact?

Cumulative energy impacts could occur as a result of the Project in combination with the other projects in the cumulative scenario. All cumulative projects would use energy during construction. However, it is reasonable to assume that the overall construction schedule and process for all cumulative projects would be designed to be efficient to comply with applicable local regulations and to avoid excess monetary costs. Additionally, all cumulative projects would include applicable air quality-related measures to lessen idling times of equipment and improve the efficiency during construction in accordance with a comprehensive regulatory framework. As a result, any construction-related cumulative energy impact due to wasteful use of energy resources would be less than significant.

The proposed Project in conjunction with other larger cumulative developments could result in cumulative energy impacts during occupation if energy were wasted. All cumulative projects would be required to be constructed consistent with the City's adopted Green Building Ordinance, which requires energy efficient design and use of fixtures to ensure buildings do not waste energy. Operation/occupation of all cumulative projects in the cumulative scenario would not result in a

[74] 99 MW * 8,760 hours per year = 867,240 MWh per year

substantial increase in demand upon energy resources because their combined energy requirements would not exceed anticipated state, county, or local energy supplies. Thus, there would not be a significant cumulative energy impact. Moreover, the Project's contribution to this already less than significant cumulative energy impact would not be cumulatively considerable for the reasons detailed above. **(Less than Significant Cumulative Impact)**

4.7 Geology and Soils

The following discussion is based on a Preliminary Geotechnical Study prepared by Langan CA, Inc. dated April 17, 2026. A copy of the report is included as Appendix I of this SPPE Application.

4.7.1 Environmental Setting

4.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was passed in 1990 following the 1989 Loma Prieta earthquake. The SHMA directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking, including the central San Francisco Bay Area. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards.

California Building Standards Code

The CBC prescribes standards for constructing safe buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared for most development projects to evaluate seismic and geologic conditions such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These materials are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code Section 5097.5 specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Local

Envision San José 2040 General Plan

The General Plan includes the following policies that are specific to geology and soils and applicable to the proposed Project.

Policy	Description
EC-3.1	Design all new or remodeled habitable structures in accordance with the most recent California Building Code and California Fire Code as amended locally and adopted by the City of San José, including provisions regarding lateral forces.
EC-4.1	Design and build all new or remodeled habitable structures in accordance with the most recent California Building Code and municipal code requirements as amended.
EC-4.2	Development in areas subject to soils and geologic hazards, including engineered fill and weak soils and landslide-prone areas, only when the severity of hazards have been evaluated and if shown to be required, appropriate mitigation measures are provided. New development proposed within areas of geologic hazards shall not be endangered by, nor contribute to, the hazardous conditions on the site or on adjacent properties. The City of San José Geologist will review and approve geotechnical and geological investigation reports for projects within these areas as part of the project approval process.
EC-4.4	Require all new development to conform to the City of San José's Geologic Hazard Ordinance.
EC-4.5	Ensure that any development activity that requires grading does not impact adjacent properties, local creeks, and storm drainage systems by designing and building the site to drain properly and minimize erosion. An Erosion Control Plan is required for all private development projects that have a soil disturbance of one acre or more, adjacent to a creek/river, and/or are located in hillside areas.

Policy	Description
	Erosion Control Plans are also required for any new grading occurring between October 15 and April 15.
EC-4.11	Require the preparation of geotechnical and geological investigation reports for projects within areas subject to soils and geologic hazards and require review and implementation of mitigation measures as part of the project approval process.
EC-4.12	Require review and approval of grading plans and erosion control plans (if applicable) prior to issuance of grading permits by the Director of Public Works.
ES-4.9	Permit development only in those areas where potential danger to health, safety, and welfare of the persons in that area can be mitigated to an acceptable level.

San José Municipal Code

Title 24 of the San José Municipal Code includes the most recent California Building, Plumbing, Mechanical, Electrical, Existing Building, and Historical Building Codes. Requirements for building safety and earthquake hazard reduction are also addressed in Chapter 17.40 (Dangerous Buildings) and Chapter 17.10 (Geologic Hazards Regulations) of the Municipal Code. Requirements for grading, excavation, and erosion control are included in Chapter 17.04 (Building Code, Part 6 Excavation and Grading). In accordance with the Municipal Code, the Director of Public Works must issue a Certificate of Geologic Hazard Clearance prior to the issuance of grading and building permits within defined geologic hazard zones, including State Seismic Hazard Zones for Liquefaction.

4.7.1.2 *Existing Conditions*

Regional Geology

The City of San José is located in the northern Santa Clara Valley, an alluvial basin underlain by sedimentary and metamorphic rocks of the Franciscan Complex. These alluvial deposits consist of unconsolidated to semi-consolidated sand, silt, clay, and gravel. The Santa Clara Valley is bounded by the Diablo Range to the east and the Santa Cruz Mountains to the west. The Valley was formed when sediments derived from both mountain ranges were exposed by tectonic uplift and regression of the inland sea which previously inundated this area.

Project Component Sites Geologic Conditions

Topography and Soils

The Project Component Sites are relatively flat and underlain by alluvial deposits generally consisting of medium stiff to hard clay with varying amounts of sand with interbedded layers of

medium dense to very dense sand and gravel with varying amounts and types of fines.[75,76] On-site soils have moderate to high potential for expansion (i.e., shrink/swell).[77,78]

Groundwater

Groundwater at the CABGF/CADC Site was encountered in soil borings at depths ranging from 8.5 to 10 feet below ground surface (bgs).[79] Historic groundwater levels based on California Geologic Survey data in the Project area (including the Trimble Substation Expansion Site and PG&E transmission line routes) range from five to 10 feet bgs.[80] Groundwater levels at the CABGF/CADC and Trimble Substation Expansion Sites may fluctuate with time due to seasonal conditions, rainfall, and irrigation practices.

Seismicity and Seismic Hazards

The Project Component Sites are located within the seismically active San Francisco Bay region. The San Francisco Bay Area contains several faults that are capable of generating earthquakes of magnitude 7.0 or higher. The major active faults in the area are the San Andreas, Monte Vista-Shannon, Hayward, and Calaveras faults. The closest faults to the Project Component Sites are the Silver Creek fault (approximately 0.2-mile east of the CABGF/CADC Site), Hayward fault (approximately 5.2 miles northeast of the CABGF/CADC Site), Calaveras fault (approximately 7.3 miles east of the CABGF/CADC Site), and Mission fault (approximately 7.6 miles northeast of the CABGF/CADC Site).[81]

The Project Component Sites are not located within an Alquist-Priolo Earthquake Fault Zone.[82,83] The Silver Creek fault zone is located approximately 0.2-mile east of the CABGF/CADC Site. However, this trace lacks evidence of Holocene movement and is not considered a source of seismic shaking.[84]

Liquefaction

Liquefaction can be defined as ground failure or loss of strength that causes otherwise solid soil to take on the characteristics of a liquid. This phenomenon is triggered by earthquakes or ground shaking that causes saturated or partially saturated soils to lose strength, potentially resulting in the

[75] Langan CA, Inc. *Preliminary Geotechnical Study 309 East Brokaw Road – Substation*. April 17, 2026. Pages 1-2.
[76] Natural Resource Conservation Service. "Web Soil Survey." Accessed July 7, 2026. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.
[77] Langan CA, Inc. *Preliminary Geotechnical Study 309 East Brokaw Road – Substation*. April 17, 2026. Page 2.
[78] Natural Resource Conservation Service. "Web Soil Survey." Accessed July 7, 2026. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.
[79] Langan CA, Inc. *Preliminary Geotechnical Study 309 East Brokaw Road – Substation*. April 17, 2026. Page 2.
[80] Ibid. Page 2.
[81] Ibid. Page 3.
[82] Ibid. Page 6.
[83] Department of Conservation. "Earthquake Zones of Required Investigation." Accessed July 7, 2026. https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/.
[84] Langan CA, Inc. *Preliminary Geotechnical Study 309 East Brokaw Road – Substation*. April 17, 2026. Page 6.

soil's inability to support structures. Liquefaction can result in adverse impacts to human and building safety and is typically addressed at the building design stage of a project. The Project Component Sites are located in a Liquefaction Hazard Zone as identified in maps prepared by the California Geological Survey.[85,86]

Lateral spreading is a type of ground failure related to liquefaction. It consists of the horizontal displacement of flat-lying alluvial material toward an open area/free face, such as a steep bank of a stream channel. There are no nearby free faces on the Project Component Sites; thus, the potential for lateral spreading on-site is low.[87]

Landslide

The Project Component Sites are not within a landslide zone.[88]

Paleontological Resources

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. Most of the City of San José is situated on alluvial fan deposits of Holocene age that have a low potential to contain significant nonrenewable paleontological resources; however, older Pleistocene sediments present at or near the ground surface at some locations have high potential to contain these resources. These older sediments, often found at depths greater than 10 feet below the ground surface, have yielded the fossil remains of plants and extinct terrestrial Pleistocene vertebrates. Based on Figure 3.11-1 of the General Plan Final Program EIR, the Project Component Sites are located in an area of high paleontological sensitivity at depth.[89]

[85] Ibid. Page 5.
[86] Department of Conservation. "Earthquake Zones of Required Investigation." Accessed July 7, 2026. https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/.
[87] Langan CA, Inc. *Preliminary Geotechnical Study 309 East Brokaw Road – Substation*. April 17, 2026. Page 6.
[88] Department of Conservation. "Earthquake Zones of Required Investigation." Accessed July 7, 2026. https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/.
[89] City of San José. *Integrated Final Program Environmental Impact Report for the Envision San José 2040 General Plan.* SCH# 2009072096. September 2011. Figure 3.11-1.

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?	☐	☐	☒	☐
- Strong seismic ground shaking?	☐	☐	☒	☐
- Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
- Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☐	☒	☐
Would the project result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact?	☐	☐	☒	☐

4.7.2.1 *Project Impacts*

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?

Fault Rupture

As described in Section 4.7.1.2 Existing Conditions, the Project Component Sites are not located within an Alquist-Priolo Earthquake Fault Zone or a Santa Clara County Fault Rupture Hazard Zone. Since no faults are located on or adjacent to the Project Component Sites, fault rupture at the Sites is unlikely. While existing faults are located in the region, the Sites would be outside of the fault zone for any regional fault systems, and significant impacts from fault ruptures are not anticipated to occur. **(Less than Significant Impact)**

Seismic Ground Shaking

The Project Component Sites are located within the seismically active San Francisco Bay region. The faults in this region are capable of generating earthquakes of magnitude 7.0 or higher. During an earthquake, very strong ground shaking could occur at the Site.

Consistent with the City's General Plan and Municipal Code, to avoid and/or minimize potential damage from seismic shaking, the proposed CABGF/CADC and Trimble Substation Expansion will be required to be built using standard engineering and seismic safety design techniques. The following PDM, which is based on a Standard Permit Condition in the City of San José, shall be implemented to ensure the proposed CABGF/CADC and Trimble Substation Expansion are designed to address seismic hazards.

PDM GEO-1: **Geologic Hazard Best Management Practices**. Consistent with City of San José Standard Permit Conditions related to geological hazards, the Project shall incorporate and implement the following measures during construction:

- To avoid or minimize potential damage from seismic shaking, the Project shall be constructed using standard engineering and seismic safety design techniques. Building design and construction at the site shall be completed in conformance with the recommendations of an approved geotechnical investigation. The report shall be reviewed and approved by the City of San José Department of Public Works as part of the building permit review and issuance process. The buildings shall meet the requirements of applicable Building and Fire Codes as adopted or updated by the City. The Project shall be

designed to withstand soil hazards identified on the site and the Project shall be designed to reduce the risk to life or property on site and off site to the extent feasible and in compliance with the Building Code.

- All excavation and grading work shall be scheduled in dry weather months or, in the alternative, construction sites shall be weatherized.
- Stockpiles and excavated soils shall be covered with secured tarps or plastic sheeting when not in use.
- Ditches shall be installed to divert runoff around excavations and graded areas if necessary.
- The Project shall be constructed in accordance with the standard engineering practices in the California Building Code, as adopted by the City of San José. These standard practices would ensure that the future buildings on the Project Site are designed to properly account for soils-related hazards on the Project Site.

With implementation of the PDM GEO-1, the proposed Project would not expose people or structures to substantial adverse effects due to ground shaking; nor would the Project exacerbate existing geological hazards on the Sites such that it would impact (or worsen) off-site geological and soil conditions. **(Less than Significant Impact)**

Liquefaction

As mentioned in Section 4.7.1.2 Existing Conditions, the Project Component Sites are located within a Liquefaction Hazard Zone. According to the City's Municipal Code, a Certificate of Geologic Hazard Clearance is required for the CABGF/CADC prior to issuance of grading and/or development permits due to its location within a Geologic Hazard Zone. By subjecting the CABGF/CADC to review by the City of San José's geologist and requiring geologic hazard clearance from the Director of Public Works (pursuant with PDM GEO-1), hazards posed by seismically induced liquefaction at the CABGF/CADC site would be reduced to less than significant. Although the Trimble Substation Expansion would not be required to obtain a Certificate of Geologic Hazard Clearance from the City because it would be a public utility under the exclusive jurisdiction of the CPUC, implementation of PDM GEO-1 would reduce impacts to less than significant on the Site. **(Less than Significant Impact)**

Lateral Spreading

As mentioned in Section 4.7.1.2 Existing Conditions, the Project Component Sites have low probability for lateral spreading. In accordance with City policy and PDM GEO-1 discussed above, the proposed Project will be designed in accordance with a site-specific geotechnical investigation to reduce the risk of geologic hazards at the Sites, including lateral spreading. By constructing the Project in accordance with standard engineering practices and the recommendations of the

geotechnical investigation, the proposed Project will not result in a significant impact related to lateral spreading. **(Less than Significant Impact)**

Landslides

As mentioned in Section 4.7.1.2 Existing Conditions, the Project Component Sites are located in a relatively flat area and not mapped in a landslide hazard area; thus, construction of the Project will not result in a significant impact related to landslides. **(Less than Significant Impact)**

b) Would the project result in substantial soil erosion or the loss of topsoil?

Ground disturbance on the Project Component Sites will occur during grading/excavation, trenching for utilities, and construction of the proposed building, and other proposed improvements and infrastructure. These activities could increase the exposure of affected soils to wind and water erosion. The MRP, City's urban runoff policies, and the Municipal Code are the primary means of enforcing erosion control measures through the grading and building permit process (refer to Section 4.10.1.1 Regulatory Framework in Section 4.10 Hydrology and Water Quality for more details about these regulatory policies). The CABGF/CADC and Trimble Substation Expansion will disturb more than one acre and will be required to comply with the NPDES General Permit for Construction. In addition, the Project would implement PDM HYD-1.1, based on City Standard Permit Conditions, to reduce construction-related water quality impacts. For these reasons, the Project's potential erosion impacts would be reduced to a less than significant level. **(Less than Significant Impact)**

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

As discussed in Section 4.7.1.2, the Project Component Sites are located within a Liquefaction Hazard Zone and are located in a relatively flat area and not mapped in a landslide hazard area.

Impacts related to these geological hazards will be further reduced with implementation of the PDM GEO-1 above, which requires future developments to be designed and constructed in accordance with applicable provisions of the recent California Building Code and a design-level geotechnical investigation. The design-level geotechnical investigation would identify site-specific ground failure hazards such as liquefaction and lateral spreading and appropriate techniques to minimize risks to people and structures. Development of the Project Component Sites will not change or exacerbate the geologic conditions of the Project vicinity. Therefore, the Project will not be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

d) Would the project be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?

As described in Section 4.7.1.2 Existing Conditions, the Project Component Sites are located on moderately to highly expansive soils. By adhering to the recommendations included in the geotechnical investigation for soil and seismic hazards and by implementing PDM GEO-1, the proposed Project would not result in a significant impact due to the underlying soils nor would it create substantial direct or indirect risks to life or property due to expansive soils. **(Less than Significant Impact)**

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The proposed Project would dispose of wastewater via lateral connections to the City's sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. **(No Impact)**

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

As described in Section 4.7.1.2 Existing Conditions, the Project Component Sites are sensitive for paleontological resources at depth. As mentioned in Section 3.5.9, the maximum excavation depth is 10 feet bgs. There is no specific depth below the ground surface where paleontological resources would be found in areas with high sensitivity for paleontological resources at depth, therefore the Project has the potential of discovering a paleontological resource. The Project will be required to implement the following measures, based on City Standard Permit Condition, as PDM GEO-2.1 to reduce and avoid impacts to unidentified paleontological resources and PDM GEO-2.2 to educate construction workers to identify fossils.

PDM GEO-2.1: **Worker Environmental Awareness Program for Paleontological Resources**. Prior to the start of construction, the Project Applicant shall secure the services of a qualified paleontologist specialist, as defined by the Society of Vertebrate Paleontology. The specialist shall prepare a Worker Environmental Awareness Program to instruct site workers of the obligation to protect and preserve valuable paleontological resources for review by the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee. This program shall be provided to all construction workers via a recorded presentation and shall include a discussion of applicable laws and penalties under the laws; samples or visual aids of resources that could be encountered in

the project vicinity; instructions regarding the need to halt work in the vicinity of any potential paleontological resources encountered; and measures to notify their supervisor, the applicant, and the qualified paleontologist specialist.

Prior to the start of any subsurface excavations that would extend beyond previously disturbed soils, all construction forepersons and field supervisors shall receive training by a qualified professional paleontologist, as defined by the Society of Vertebrate Paleontology (SVP 2010), who is experienced in teaching non-specialists, to ensure they can recognize fossil materials and shall follow proper notification procedures in the event any are uncovered during construction. Procedures to be conveyed to workers are halting construction within 50 feet of any potential fossil find and notifying a qualified paleontologist, who shall evaluate its significance.

PDM GEO-2.2: **Stop Work for Paleontological Resources**. If a fossil is encountered, the City shall be notified immediately and a qualified paleontologist shall be retained by the Project Applicant to examine the fossil, and if determined to be significant and avoidance is not feasible, Project construction shall be halted within a 50-foot radius of the find and the paleontologist shall develop and implement an excavation and salvage plan in accordance with Society of Vertebrate Paleontology standards. The excavation and salvage plan shall be provided to the City for approval prior to implementation. Construction work in the immediate area shall be halted or diverted to allow recovery of fossil remains in a timely manner. Fossil remains collected shall be cleaned, repaired, sorted, and cataloged, along with copies of all pertinent field notes, photos, and maps.

The construction of the PG&E transmission lines would be subject to APMs GEO-1 and GEO-2, which are described below.

APM GEO-1: Protect Unanticipated Paleontological Resource Discoveries. If potential paleontological resources are discovered during construction activities, work will stop within 100 feet and the project paleontologist, who meets the minimum qualification standards established by the Society for Vertebrate Paleontology, will be contacted immediately. If the discovery is determined to be significant, PG&E will implement measures to protect and document the paleontological resource, as directed by the paleontologist in consultation with the landowner, PG&E, and California Department of Fish and Wildlife. Efforts will be made to retain and protect such resources in place. If recovery of those resources is required to prevent their destruction, the paleontologist will develop a recovery strategy at a level appropriate to the discovery and in accordance with industry practice. The paleontologist will supervise the recovery effort, which may include the following components as appropriate to reduce impacts to a less-than-significant level: establishing recovery standards, preparing specimens for identification and preservation,

documentation and reporting, and securing a curation agreement from the approved agency.

Work may not resume within 100 feet of the find until approval by the paleontologist.

APM GEO-2: Provide worker environmental awareness training. PG&E will provide environmental awareness training on paleontological resources protection when in areas with known or discovered resources. This training will include: types of paleontological resources that could occur at the project site; types of soils or lithologies in which the paleontological resources could be preserved; procedures that should be followed in the event paleontological resources are discovered; and penalties for disturbing paleontological resources.

With implementation of PDM GEO-2.1 and GEO-2.2 along with PG&E's programmatic measures, the proposed Project would result in a less than significant impact to paleontological resources. **(Less than Significant Impact)**

4.7.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact?

The geographic scope for this cumulative analysis is the CABGF/CADC Site, Trimble Substation Expansion Site, PG&E transmission line routes area, and adjacent parcels. Cumulatively, all other cumulative projects in the general vicinity of the Project Site would trigger similar geology, soils, and seismicity impacts as the proposed Project. All cumulative projects are required to implement standard conditions of approval (similar to PDM GEO-1) as well as identified mitigation measures, and to ensure consistency with applicable provisions of the California Building Code to avoid significant impacts related to seismic, geologic, and soils hazards and/or reduce them to a less than significant level. Thus, there would not be a cumulative significant impact in this regard. Moreover, for the reasons described above, the Project's contribution to this already less than significant cumulative impact would not be cumulatively considerable.

Regarding paleontological resources, cumulative projects involving excavation at depth would result in similar impacts in connection with construction. However, adherence to the Standard Permit Condition listed in PDM GEO-2.1 and GEO 2.2 for discovery of paleontological resources as well as other identified mitigation measures, and adherence to other applicable requirements and standards will ensure that there would not be a cumulative significant impact in this regard. Moreover, for the reasons described above, the Project's contribution to this already less than significant cumulative impact is not cumulatively considerable. For these reasons, the cumulative projects, including the proposed Project, will not result in significant cumulative geologic and soils impacts. **(Less than Significant Cumulative Impact)**

4.8 Greenhouse Gas Emissions

The following discussion is based, in part, on a 2030 Greenhouse Gas Reduction Strategy Compliance Checklist completed by the Applicant (attached to this application as Appendix J) and the Air Quality and Greenhouse Gas Emissions Assessment (attached to this application as Appendix F).

4.8.1 Environmental Setting

4.8.1.1 *Background Information*

Greenhouse gases (GHG) are gases that trap heat in the atmosphere and regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO_2 equivalents (CO_2e). The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities (anthropogenic). Natural and anthropogenic sources of GHGs are generally as follows:

- CO_2 exchange between the atmosphere, ocean, and land surface
- CO_2, CH_4, and N_2O are emitted from wildfires and volcanic eruptions
- CO_2 and N_2O are byproducts of fossil fuel combustion
- N_2O is associated with agricultural operations such as fertilization of crops
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty
- HFCs are now used as a substitute for CFCs in refrigeration and cooling
- PFCs and SF_6 emissions are commonly created by industries such as aluminum production and semiconductor manufacturing

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. Per the 2022 Scoping Plan from CARB, atmospheric concentrations of CO_2 have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year, which will result in increased global temperatures.[90] The various climates within California are adversely affected by

[90] CARB. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Page 3.

the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

4.8.1.2 *Regulatory Framework*

State

Assembly Bill 32 and State Bill 32

Under the California Global Warming Solutions Act, known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources. The first Scoping Plan was approved by CARB in 2008 and must be updated at least every five years. Since 2008, there have been two updates to the Scoping Plan.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to accelerate 2030 statewide target in terms of million metric tons of CO_2e ($MMTCO_2e$). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$.

2022 Scoping Plan

On December 15, 2022, CARB approved the 2022 Scoping Plan. The 2022 Scoping Plan provides a sector-by-sector guide on how to reduce man-made (i.e., anthropogenic) GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045 over a 25-year horizon.[91] The primary focus of the 2022 Scoping Plan is to reduce the usage of fossil fuels by electricizing the transportation sector, procuring electricity from renewable resources, phasing out natural gas in land use developments, and building transit-oriented communities that encourage multi-modal transportation. If implemented successfully, the 2022 Scoping Plan would not only reduce GHG emissions but also reduce smog-forming air pollution (NO_x) by 71 percent and reduce fossil fuel demand by 94 percent. The 2022 Scoping Plan also details natural carbon capture and storage process along with mechanical carbon capture programs to address the remaining 15 of anthropogenic GHG emissions that will remain post-2045. To meet these goals, CARB also includes a revised goal of reducing state GHG emissions 48 percent below 1990 levels by 2030.

[91] CARB. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Page 5.

Senate Bill 375 and Plan Bay Area 2050

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light truck sectors for 2020 and 2035. The per capita GHG emissions reduction targets for passenger vehicles in the Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), the Air District, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2050.

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified priority development areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[92]

Play Bay Area 2050 includes a goal to increase the number of households that live within 0.5 mile of frequent transit by 2050. Plan Bay Area 2050 promotes strategies that support active and shared modes, combined with a transit-supportive land use patterns, which together are forecasted to lower the share of Bay Area residents that drive to work alone from 50 percent in 2015 to 33 percent in 2050, resulting in a decrease in GHG emissions. Plan Bay Area 2050 also provides a path to emissions reductions via goals to expand TDM initiatives that support and augment employers' commute programs.

SB 100

SB 100, known as The 100 Percent Clean Energy Act of 2018, was adopted on September 10, 2018. The overall goal is to have all retail electricity sold in California be procured from 100 percent renewable and zero-carbon resources by the year 2045. SB 100 also modified the renewables portfolio standard to 50 percent by 2025 and 60 percent by 2030.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

[92] Association of Bay Area Governments and Metropolitan Transportation Commission. Plan Bay Area 2050. October 21, 2021. Page 20.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved on September 16, 2022 and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the scoping plan identify and recommend measures to achieve these policy goals and implement strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

Advanced Clean Cars II Regulation

To continue reducing air pollutants and GHG emissions in the transportation sector, CARB adopted the Advanced Clean Cars II Regulations (Resolution 22-12) on August 25, 2022. The new regulation requires that by 2035 all new passenger cars, trucks, and SUVs sold in California will be zero-emission vehicles. This regulation bans the sale of new gasoline or diesel passenger cars, trucks, and SUVs in California from automakers. Beginning in 2026, 35 percent of new vehicle sales must be zero-emission vehicles and plug-in hybrid EVs and that percentage will increase per year. By 2030, 70 percent of new vehicle sales will be zero-emissions vehicles and by the 2035 model year 100 percent of new vehicle sales will be zero-emissions. CARB will limit the use of plug-in hybrid EVs in the percentage requirements to keep the manufacturing of zero-emissions as the primary goal. Existing gasoline cars can continue to be driven and sold as used cars beyond 2035. CARB is required to track and report on the zero-emissions vehicle market development annually.

California Building Standards Code – Title 24 Part 11 and Part 6

The CALGreen Code is part of the CBSC under Title 24, Part 11.93 The CALGreen Code encourages sustainable construction standards that incorporate planning/design, energy efficiency, water efficiency resource efficiency, and environmental quality. These green building standard codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2025 CALGreen Code) will be effective on January 1, 2026.

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the Commission. This code includes design requirements to conserve energy in new residential and non-residential developments. This Energy Code is enforced and verified by cities during the planning and building permit process. The 2025 Energy Code replaces the 2022 Energy Code on January 1, 2026. There are new 2025 standards for single-family residences, multi-family residences, and non-residential uses.

[93] Refer to https://www.dgs.ca.gov/BSC/Codes.

Regional and Local

2017 Clean Air Plan

To protect the climate, the 2017 Clean Air Plan prepared by the Air District includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

Bay Area Air District CEQA Thresholds for Evaluating Climate Impacts from Land Use Projects and Plans

In April 2022, the Air District Board of Directors adopted the Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans. The report includes the Air District's thresholds of significance for use in determining whether a proposed project or plan will have a significant impact on climate change and provides substantial evidence to support these thresholds. The April 2022 GHG thresholds, as shown in Section 4.8.2.1 below, replace the GHG thresholds set forth in the May 2017 Air District CEQA Air Quality Guidelines and represent what is required of new land use development projects and plans to achieve California's long-term climate goal of carbon neutrality by 2045.

Envision San José 2040 General Plan

The General Plan includes the following GHG policies applicable to the proposed Project.

Policy	Description
MS-2.11	Require new development to incorporate green building practices, including those required by the Green Building Ordinance. Specifically, target reduced energy use through construction techniques (e.g., design of building envelopes and systems to maximize energy performance), through architectural design (e.g., design to maximize cross ventilation and interior daylight) and through site design techniques (e.g., orienting buildings on sites to maximize the effectiveness of passive solar design).
MS-14.4	Implement the City's Green Building Policies so that new construction and rehabilitation of existing buildings fully implements industry best practices, including the use of optimized energy system, selection of materials and resources, water efficiency, sustainable site selection, passive solar building design, and planting of trees and other landscape materials to reduce energy consumption.

City of San José Reach Building Code

In 2019, the San José City Council approved Ordinance No. 30311 and adopted Reach Code Ordinances (Reach Code) to reduce energy related GHG emissions consistent with the goals of Climate Smart San José. The Reach Codes apply to new construction projects in San José.

Climate Smart San José

Climate Smart San José is a plan to reduce air pollution, save water, and create a stronger and healthier community. The City approved goals and milestones in February 2018 to ensure the City can substantially reduce GHG emissions through reaching the following goals and milestones:

- All new residential buildings will be Zero Net Carbon Emissions (ZNE) by 2020 and all new commercial buildings will be ZNE by 2030 (Note that ZNE buildings would be all electric with a carbon-free electricity source)
- One gigawatt of solar power will be installed in San José by 2040
- 61 percent of passenger vehicles will be powered by electricity by 2030

San José 2030 Greenhouse Gas Reduction Strategy

The 2030 Greenhouse Gas Reduction Strategy (GHGRS) is the latest update to the City's GHGRS and is designed to meet statewide GHG reduction targets for 2030 set by SB 32. As a qualified Climate Action Plan, the 2030 GHGRS allows for tiering and streamlining of GHG analyses under CEQA. The GHGRS identifies General Plan policies and strategies to be implemented by development projects in the areas of green building/energy use, multi-modal transportation, water conservation, and solid waste reduction. Projects that are consistent with the land use designation that covers the site they are located on and comply with the policies and strategies outlined in the 2030 GHGRS, would have less than significant GHG impacts under CEQA.

4.8.1.3 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in weather patterns. The Project Sites do not actively emit GHG emissions since they are unoccupied.

4.8.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
Would the project result in a cumulatively considerable contribution to a cumulatively significant GHG emissions impact?	☐	☐	☒	☐

4.8.2.1 *Thresholds of Significance*

Pursuant with the latest Air District guidelines, for land use projects to result in a less than significant GHG emissions impact, the land use project would need to comply with either threshold A or B below.

A. Projects must include, at a minimum, the following project design elements:
   1. Buildings
      a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
      b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

   2. Transportation
      a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
         i. Residential projects: 15 percent below the existing VMT per capita
         ii. Office projects: 15 percent below the existing VMT per employee
         iii. Retail projects: no net increase in existing VMT
      b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b)

This Project is consistent with the City's General Plan land use designations for the Project Component Sites, therefore; the City's local GHGRS can be used. The City of San José's 2030 GHGRS

is a qualified GHGRS that meets the criteria under State CEQA Guidelines Section 15183.5(b). Threshold B is applicable to the Project.

In addition, the Air District has adopted a numeric threshold of 10,000 metric tons of CO_2e per year (MT CO_2e/year) for projects that require permits from the Air District. Given that the Project would include standby generators requiring Air District permits to operate, the significance threshold applicable to stationary source emissions from the Project is 10,000 MT CO_2e/year. This Air District threshold is consistent with stationary source thresholds adopted by other air quality management districts throughout the state.

4.8.2.2 *Project Impacts*

a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Emissions

As shown in the emissions calculations in Table 4.3-7 in Section 4.3 Air Quality, the Project's total GHG emissions from single-shift construction activities would be approximately 657.1 metric tons CO_2e/max year and 1,057.5 metric tons CO_2e over the full construction period, and for double-shift construction activities would be approximately 1,044.6 metric tons CO_2e/max year and 1,305.2 metric tons CO_2e over the full construction period. Since construction emissions would cease once construction is complete, they are considered temporary emissions. Neither the Commission, City of San José, nor the Air District have an adopted threshold of significance for construction-related GHG emissions. Based on the temporary nature of construction GHG emissions, the Project would not interfere with the implementation of SB 32, and the impact is considered less than significant. **(Less Than Significant Impact)**

Operational Emissions

Stationary Source Emissions

As shown in the emissions calculations in Table 4.3-9 in Section 4.3 Air Quality, the Project's maximum annual GHG emissions from maintenance and readiness testing of the backup generators would be approximately 4,792 metric tons CO_2e per year. This is below the Air District's threshold of 10,000 metric tons CO_2e per year for stationary sources and is, therefore, less than significant. **(Less Than Significant Impact)**

Consistency with City of San José GHGRS

As discussed in Section 4.8.1.2 Regulatory Framework projects that comply with the policies and strategies outlined in the City's 2030 GHGRS would have a less than significant GHG impact. The City

has developed a consistency checklist to determine if a project is consistent with the 2030 GHGRS, which would show compliance with the State's goal of reducing statewide GHG emissions 40 percent below 1990 level by 2030 (SB 32). Compliance with these mandatory policies and strategies by the Project ensures consistency with the 2030 GHGRS.

As documented in Appendix J, the Project would be consistent with the mandatory policies and strategies of the 2030 GHGRS. Therefore, since the Project would be consistent with 2030 GHGRS, GHG emissions generated by the Project would not conflict with SB 32. The Project includes the following PDM to ensure consistency with the City's GHGRS. This PDM is consistent with measures approved by the City of San José and the Commission in recent data center projects.

PDM GHG-1: **Carbon-Free Energy**. The Project Owner shall participate in the SJCE at the TotalGreen level (i.e., 100% carbon-free electricity) for electricity accounts associated with the Project or participate in a clean energy program that accomplishes the same goals of 100 percent carbon-free electricity as the SJCE TotalGreen Level.

During operation, the Project Owner shall provide documentation to the Director or Director's designee with the City of San José Planning, Building and Code Enforcement of initial enrollment and shall submit annual reports to the Director or Director's designee with the City of San José Department of Planning, Building and Code Enforcement documenting either continued participation in SJCE at the TotalGreen level or documentation that alternative measures continue to provide 100 percent carbon-free electricity, as verified by an independent third-party auditor specializing in greenhouse gas emissions.

While not required by any law, regulation, the 2030 GHGRS, or requirement to mitigate any significant project impact, the Project also includes the following PDM as a voluntary commitment to the use of renewable diesel as its primary fuel source for the backup generating facilities.

PDM GHG-2: **Use of Renewable Fuel**. The Project Owner shall use renewable diesel fuel for the diesel-fired generators to the extent feasible. During an emergency where renewable diesel fuel supplies may be limited, the Project Owner shall document their efforts to secure other vendors of renewable diesel fuel prior to refueling with non-renewable diesel. The project owner shall submit annual reports, beginning after project operations, to the Director or Director's designee with the City of San José Department of Planning, Building and Code Enforcement documenting the amount of renewable diesel used by the generators.

Based on the above analysis, the Project's operational GHG emissions would be consistent with the Air District's GHG Threshold B, which would ensure consistency with the SB 32 and carbon neutral

goals set by the State. Therefore, the proposed Project would result in a less than significant GHG impact during construction and operations of the proposed Project. **(Less than Significant Impact)**

Trimble Substation Expansion and Transmission Line

The PG&E Trimble Substation Expansion and transmission line would not generate GHG emissions, either directly or indirectly, during operation since the electrical infrastructure would convert and distribute electricity instead of consuming it. Therefore, the PG&E infrastructure would result in less than significant operational GHG impacts. **(Less than Significant Impact)**

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

CARB 2022 Scoping Plan

As described in Section 4.8.1.2 Regulatory Framework, the 2022 Scoping Plan is a document that plans how the State will achieve carbon neutrality by 2045 and reduce anthropogenic emissions to 85 percent below 1990 levels by 2045. The latest Air District GHG qualitative thresholds were designed to ensure future projects complete their "fair share" of implementing carbon reduction design features to help achieve the State's carbon neutrality goal. A project that can either meet the energy and transportation design elements under Threshold A or is consistent with a qualified GHG reduction strategy under Threshold B is then consistent with the goals outlined in the 2022 Scoping Plan and would not hinder the State from achieving carbon neutrality. As described under checklist question a), the Project would be consistent the City's qualified 2030 GHGRS compliance checklist. Therefore, the proposed Project's contribution would not be cumulatively considerable as it does not impede California's ability to achieve carbon neutrality.

California Senate Bill 100

SB 100 advances the RPS renewable resources requirement to 50 percent by 2026 and 60 percent by 2030. It also requires renewable energy resources and zero-carbon resources to supply 100 percent of all retail sales of electricity by 2045. The Project's GHG emissions are predominantly from electricity usage. Since all electricity supplied by SJCE or PG&E to the Project would be subject to the RPS requirements promulgated under SB 100, the Project would not conflict with plans, policies, or regulations adopted pursuant to SB 100.

Bay Area 2017 Clean Air Plan

The Bay Area 2017 Clean Air Plan includes performance objectives, consistent with the state's climate protection goals under AB 32 and SB 375, designed to reduce GHG emissions to 1990 levels by 2030 and 80 percent below 1990 levels by 2050. Due to the relatively high electrical demand

of the Project, energy efficiency measures are included in the design and operation of the on-site electrical and mechanical systems. Additionally, as described above, the Project would participate in a clean energy program that accomplishes 100 percent carbon-free electricity for the Project. This would be consistent with the general purpose of Energy and Climate Measure (ECM)-1 – Energy Efficiency in the 2017 Bay Area Clean Air Plan.

City of San José GHGRS

The Project applicant would be required to apply for building permits for the Project from the City of San José. For commercial or industrial projects subject to development review by the City of San José, the City's 2030 GHGRS presents the City's comprehensive path to reduce GHG emissions to achieve the SB 32 2030 reduction target of reducing statewide GHG emissions 40 percent below the 1990 level by 2030. Additionally, the 2030 GHGRS leverages other important City plans and policies, including the General Plan, Climate Smart San José, and the City Municipal Code in identifying reductions strategies that achieve the City's target. The Project applicant would be required to incorporate measures from the GHGRS into the Project, as specified by the City during the design review process to ensure compliance with applicable laws, ordinances, regulations, and standards. Conformance with the applicable design codes and policies would be enforced during the City design review process. As discussed above, the Project would be consistent with the 2030 GHGRS (refer to Appendix J).

City of San José General Plan, Climate Smart San José, and Green Building Ordinance

The Project would be consistent with the City's General Plan policies, Climate Smart San José, and Green Building Ordinance, which are all local regulations that aim to improve sustainable design and reduce GHG emissions. As required by the State and the City, the Project would be constructed in compliance with the current CALGreen Building Standards Code (Title 24, Part 11) to increase energy and water efficiency standards in new developments. The CALGreen Building Standards requires efficient windows, insulation, lighting, ventilation systems, and other features that reduce water and energy consumption. Also as mentioned previously, the Project would source carbon-free electricity for the data center building, which would reduce energy-related GHG emissions. There would also be electric vehicle parking spaces and charging infrastructure to support the transition to electric vehicles, which would reduce reliance on gasoline fueled vehicles. Pursuant to the City's Green Building requirements, the Project would also be required to demonstrate and achieve (at a minimum) the LEED Silver level certification, which would reduce water and energy.[94] Therefore, the Project would be designed in a manner that requires more efficient energy and water use and supports electric vehicle infrastructure. The Project would be consistent with Climate Smart San José and Green Building Ordinance along with complying with the City's General Plan policies related to GHG emissions reduction.

[94] Refer to San José Municipal Code Chapter 17.84 Green Building Regulations for Private Development.

Conclusion

With implementation of the efficiency measures to be incorporated into the Project and the implementation of PDM GHG-1 and PDM GHG-2, GHG emissions related to the Project would be consistent with applicable plans and policies adopted to reduce GHG emissions and would be required to comply with all regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For these reasons, the Project would not conflict with an applicable plan, policy or regulation for GHG reductions. **(Less than Significant Impact)**

4.8.2.3 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant GHG emissions impact?

As discussed above, GHG emissions worldwide contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single land use project could generate sufficient GHG emissions on its own to noticeably change the global average temperature. The combination of GHG emissions from past, present, and foreseeable future projects in San José, the entire state of California, and across the nation and around the world, contribute cumulatively to the phenomenon of global climate change and its associated environmental impacts. The above analysis of the Project's GHG emissions impacts is, therefore, also an analysis of the Project's contribution to cumulative GHG emissions impacts. **(Less than Significant Cumulative Impact)**

4.9 Hazards and Hazardous Materials

The following discussion is based on Phase I Environmental Site Assessments (ESA) prepared by Partner Engineering and Science, Inc. dated September 8, 2025, and ERM, dated July 14, 2026. Copies of these reports are included as Appendix K of this SPPE Application.

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. Cal/OSHA enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Federal and State

Federal Aviation Regulations Part 77

Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the Federal Aviation Administration (FAA) be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above the ground.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the

chemical and petroleum industries and provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Over five years, $1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA accomplished the following objectives:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provided for liability of persons responsible for releases of hazardous waste at these sites; and
- Established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and
- Long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life-threatening. These actions can be completed only at sites listed on the EPA's National Priorities List.

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.[95]

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA gives the EPA the authority to control hazardous waste from the "cradle to the grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective action for releases. Some of the other mandates of this law include increased enforcement

[95] United States Environmental Protection Agency. "Superfund: CERCLA Overview." Accessed March 3, 2026. https://www.epa.gov/superfund/superfund-cercla-overview.

authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.[96]

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).[97]

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

California Accidental Release Prevention Program

The California Accidental Release Prevention (CalARP) Program aims to prevent accidental releases of regulated hazardous materials that represent a potential hazard beyond the boundaries of a property. Facilities that are required to participate in the CalARP Program use or store specified quantities of toxic and flammable substances (hazardous materials) that can have off-site consequences if accidentally released. The Santa Clara County Department of Environmental Health reviews CalARP risk management plans as the CUPA.

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA began phasing out use of friable asbestos products in 1973 and issued a ban in 1978 on manufacture, import, processing, and distribution of some asbestos-containing products and new uses of asbestos products.[98] The EPA is currently considering a proposed ban on on-going use of

[96] United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed March 3, 2026. https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act.
[97] California Environmental Protection Agency. "Cortese List Data Resources." Accessed March 3, 2026. https://calepa.ca.gov/sitecleanup/corteselist/.
[98] United States Environmental Protection Agency. "EPA Actions to Protect the Public from Exposure to Asbestos." Accessed March 3, 2026. https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos

asbestos.[99] National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

CCR Title 8, Section 1532.1

The United States Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by the Cal/OSHA Lead in Construction Standard, CCR Title 8, Section 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead-based paint is peeling, flaking, or blistered, it is required to be removed prior to demolition.

Regional and Local

Municipal Regional Permit Provision C.12.f

Polychlorinated biphenyls (PCBs) were produced in the United States between 1955 and 1978 and used in hundreds of industrial and commercial applications, including building and structure materials such as plasticizers, paints, sealants, caulk, and wood floor finishes. In 1979, the EPA banned the production and use of PCBs due to their potential harmful health effects and persistence in the environment. PCBs can still be released to the environment today during demolition of buildings that contain legacy caulks, sealants, or other PCB-containing materials.

With the adoption of the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP) by the San Francisco Bay Regional Water Quality Control Board on November 19, 2015, Provision C.12.f requires that permittees develop an assessment methodology for applicable structures planned for demolition to ensure PCBs do not enter municipal storm drain systems. Municipalities throughout the Bay Area are currently modifying demolition permit processes and implementing PCB screening protocols to comply with Provision C.12.f. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit. Single family homes and wood-frame structures are exempt from these requirements.

Envision San José 2040 General Plan

The General Plan includes the following hazards and hazardous materials policies applicable to the proposed Project.

Policy	Description
EC-7.1	For development and redevelopment projects, require evaluation of the proposed site's historical and present use to determine if any potential environmental conditions exist that could adversely impact the community or environment.

[99]Ibid.

Policy	Description
EC-7.2	Identify existing soil, soil vapor, groundwater, and indoor air contamination and mitigation for identified human health and environmental hazards to future users and provide as part of the environmental review process for all development and redevelopment projects. Mitigation measures for soil, soil vapor and ground water contamination shall be designed to avoid adverse human health and environmental risk, in conformance with regional, state, and federal laws, regulations, guidelines and standards.
EC-7.5	In development and redevelopment sites, require all sources of imported fill to have adequate documentation that it is clean and free of contamination and/or acceptable for the proposed land use considering appropriate environmental screening levels for contaminants. Disposal of groundwater from excavations on construction sites shall comply with local, regional, and State requirements.
EC-7.9	Ensure coordination with the County of Santa Clara Department of Environmental Health, Regional Water Quality Control Board, Department of Toxic Substances Control or other applicable regulatory agencies, as appropriate, on projects with contaminated soils and/or groundwater or where historical or active regulatory oversight exits.
EC-7.10	Require review and approval of grading, erosion control and dust control plans prior to issuance of a grading permit by the Director of Public Works on sites with known soil contamination. Construction operations shall be conducted to limit the creation of dispersion of dust and sediment runoff.
EC-7.11	Require sampling for residual agricultural chemicals, based on the history of land use, on sites to be used for any new development or redevelopment to account for worker and community safety during construction. Mitigation to meet appropriate end use such as residential or commercial/industrial shall be provided.
TR-14.2	Regulate development in the vicinity of airports in accordance with Federal Aviation Administration regulations to maintain the airspace required for the safe operation of these facilities and avoid potential hazards navigation.

City of San José Emergency Operations Plan

The latest City of San José Emergency Operations Plan (EOP) was adopted in May 2024. The EOP identifies emergency response policies, describes the response and recovery organization, and assigns specific roles and responsibilities to City departments, agencies, and community partners in a way that allows the EOP to be used for all emergencies that could occur within the City.

4.9.1.2 *Existing Conditions*

CABGF/CADC Site History

The CABGF/CADC Site is currently developed with five multi-tenant buildings located at 326-346 Charcot Avenue, 2070-2082 Zanker Road, 2086-2110 Zanker Road, 2118-2138 Zanker Road, and 2140-2156 Zanker Road. On-site operations consist of general office and warehouse, distribution, cabinet making, contractors, printed circuit board assembly, print shop, workshops and routine facility maintenance activities. In addition to the current structures, the subject property is

improved with asphalt-paved parking areas and driveways, concrete-paved loading docks, associated landscaping, drainage features, perimeter fencing, and dumpster and equipment enclosures. A railroad spur is located along the northeastern property line.

Based on historical sources, the CABGF/CADC Site was previously used as agricultural land prior to the development of the existing buildings in the 1970s. There are two abandoned water production wells located at the northwestern corner of the site.[100]

On-Site Sources of Contamination

The Phase I ESA did not identify any recognized environmental conditions (RECs[101]), controlled recognized environmental conditions (CRECs[102]), or historical recognized environmental conditions (HRECs[103]).[104]

Polychlorinated Biphenyls

No PCB-containing equipment was observed on the Site.[105] As noted above, a railroad spur is located along the northeastern property line. Railroad spurs represent potential environmental concerns due to the historical application of oils containing polychlorinated biphenyls (PCBs), herbicides, and arsenic for pest and weed control; the potential presence of creosote on the rail ties; the historical practice of using cinders for track fill material; and the potential for accumulation of heavy metals in near surface soils due to the transportation of trains with lead wheel bearings over the course of time. According to the Phase I ESA, concentrations of these constituents of concern resulting from the railroad spur would likely be confined to the near surface soils and are not expected to represent a significant environmental health and safety concern to the Project Site, or a threat to underlying groundwater.

Asbestos Containing Materials

Based on a visual inspection, the existing building may contain asbestos containing materials (ACMs) in the flooring, roofing, and/or drywall materials of the building interior and exterior.[106]

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[100] Valley Water. "Wells | Valley Water." Accessed October 19, 2026. https://data-valleywater.opendata.arcgis.com/datasets/43743ae1dbfa4172a3c4a0d6481093b7_0/explore?location=37.380277%2C-121.914915%2C17.

[101] A REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

[102] A CREC is defined as a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

[103] A HREC refers to a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls.

[104] Partner Engineering and Science, Inc. *Phase I Environmental Site Assessment Report 326-346 Charcot Avenue; 309-391 East Brokaw Road; and 2012-2156 Zanker Road.* September 8, 2025.

[105] Ibid.

[106] Partner Engineering and Science, Inc. *Phase I Environmental Site Assessment Report 326-346 Charcot Avenue; 309-391 East Brokaw Road; and 2012-2156 Zanker Road.* September 8, 2025.

Lead-Based Paint

Given the age of the buildings, lead-based paints are possibly present in the existing on-site buildings.[107]

Regulatory Database Listings

The CABGF/CADC Site is not listed on the Cortese List as a known source or suspected source of contamination or as a site that contains hazardous materials or hazardous waste.[108]

Trimble Substation Expansion

The Trimble Substation Expansion Site is a vacant undeveloped parcel that was previously used for agricultural purposes until at least 1968.[109]

On-Site Sources of Contamination

The Phase I ESA did not identify any RECs; however, it did identify one CREC and one HREC. The CREC is a recorded land use covenant from 2001 that prohibits residential uses on the site and the HREC is related to historical elevated levels of arsenic in the soil associated with the former agricultural uses on-site.[110] The contaminated soil was removed as part of remediation activities conducted in 2015 and 2016 and the Santa Clara County Environmental Health Department issued a No Further Action determination on March 21, 2017.

Regulatory Database Listings

It is not listed on the Cortese List as a known source or suspected source of contamination or as a site that contains hazardous materials or hazardous waste.[111,112]

PG&E Transmission Line Routes

The PG&E transmission line routes are within the same general area as the CABGF/CADC Site and Trimble Substation Expansion Site where they connect to each respective property and therefore have similar characteristics as it pertains to hazards and hazardous materials at those locations. The routes will be along public roadways. There are no documented releases of hazardous materials in the transmission line routes.[113]

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[107] Ibid.
[108] California Environmental Protection Agency. "Cortese List Data Resources." Accessed March 16, 2026. https://calepa.ca.gov/sitecleanup/corteselist/.
[109] ERM. *Phase 1 Environmental Site Assessment 2347 N. 1st St. San Jose, California*. July 14, 2026.
[110] Ibid.
[111] California Environmental Protection Agency. "Cortese List Data Resources." Accessed March 16, 2026. https://calepa.ca.gov/sitecleanup/corteselist/.
[112] State Water Resources Control Board. "GeoTracker." Accessed May 14, 2026. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2345+N+First+St%2C+San+Jose%2C+CA+95131.
[113] Ibid.

Off-Site Sources of Contamination

A review of databases and files from federal, state, and local environmental regulatory agencies was used to identify use, generation, storage, treatment, or disposal of hazardous substances and chemicals, or release incidents of such materials at surrounding facilities that may have impacted the Project Component Sites. Based on distance, regulatory status, and/or apparent groundwater gradient, there are no sites in the project vicinity that pose an environmental concern to the CABGF/CADC and Trimble Substation Expansion Sites.[114,115]

The PG&E transmission line route that runs along E. Brokaw Road and N. First Street, however, does pass open hazardous materials releases located at 2010 N. First Street and 2108 N. First Street. The GeoTracker database identifies 2010 N. First Street as an open site assessment currently under monitoring as of April 1989.[116] The site was formerly a commercial fueling facility and contaminants of concern at the site include diesel and gasoline. The GeoTracker database identifies 2108 N. First Street as an open site assessment currently under monitoring as of August 2012.[117] The site was formerly an automotive dealership with as service bay and it was used as a community college automotive training center. The contaminants of concern are benzene, chlorinated hydrocarbons, trichloroethene (TCE), motor/hydraulic oil, and vinyl chloride. On July 23, 2021, a land use covenant and environmental restriction was recorded which requires the protection and maintenance of the existing vapor instruction mitigation system (VIMS). No excavation, drilling, or any type of activity that could damage the concrete foundation and underlying VIMS is allowed to take place. The transmission line is located upgradient from the contaminated site; thus, the site is not expected to represent a significant environmental concern.

Airport Operations

The San José Mineta International Airport is located approximately one mile southwest of the Project Components Sites. The Project Component Sites are located outside the Airport Influence Area (AIA), noise contours, and the airport safety zones of the airport.[118]

Wildfires

The Project Component Sites are not located in the Wildland Urban Interface or in a CAL FIRE Fire Hazard Severity Zone (FHSZ).[119,120]

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[114] PARTNER Engineering and Science, Inc. *Phase I Environmental Site Assessment Report 326-346 Charcot Avenue; 309-391 East Brokaw Road; and 2012-2156 Zanker Road.* September 8, 2025.
[115] State Water Resources Control Board. "GeoTracker." Accessed May 14, 2026. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2345+N+First+St%2C+San+Jose%2C+CA+95131.
[116] Ibid. https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608500304.
[117] Ibid. https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000004241.
[118] City of San José. *Public GIS Viewer.* Accessed April 13, 2026. https://gis.sanjoseca.gov/maps/publicgisviewer/
[119] Ibid.
[120] California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer. Accessed April 13, 2026.* https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0

4.9.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, will it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒
h) Would the project result in a cumulatively considerable contribution to a cumulatively significant hazards and hazardous materials impact?	☐	☐	☒	☐

4.9.2.1 *Project Impacts*

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

CABGF/CADC

Construction

During the construction phase of the CABGF/CADC, the only hazardous materials used would be paints, cleaners, solvents, gasoline, motor oil, welding gases, and lubricants. When not in use, any hazardous material would be stored in designated construction staging areas in compliance with local, state, and federal requirements. Any impacts resulting from spills or other accidental releases of these materials would be limited to the site due to the small quantities involved and their infrequent use, hence reduced chances of release. Temporary containment berms would also be used to help contain any spills during the construction of the project.

During construction, all 44 diesel generator fuel tanks would have to be filled. The transportation of the diesel fuel to the site would take several tanker truck trips. Diesel fuel has a long history of being routinely transported and used as a common motor fuel. It is appropriate to rely upon the extensive regulatory program that applies to the shipment of hazardous materials on California highways and roads to ensure safe handling in general transportation (see Federal Hazardous Materials Transportation Law 49 USC Section 5101 et seq., DOT regulations 49 C.F.R. subpart H, Sections 172–700, and California Department of Motor Vehicles (DMV) regulations on hazardous cargo). Thus, the transportation of diesel fuel would pose a less than significant risk to the surrounding public. Therefore, the routine transport, use or disposal of hazardous materials during construction would have a less than significant impact to the public or the environment. **(Less Than Significant Impact)**

Operation

Operation of the CABGF/CADC would include the use and storage of diesel fuel for testing and maintenance of the backup generators. Some oils and lubricants could be stored on-site for maintenance of mechanical equipment in the equipment yards. The CABGF/CADC would be required to prepare a Spill Prevention, Control and Countermeasure (SPCC) Plan in accordance with applicable laws and regulations to address the storage, use and delivery of renewable diesel and diesel fuel for the generators.

As described in Section 3.4.7 Hazardous Materials Management, the CABGF will prepare a SPCC to address the storage, use and delivery of diesel fuel for the generators. Each generator unit and its integrated fuel tanks have been designed with double walls. The interstitial space between the walls of each tank is continuously monitored electronically for the existence of liquids. Additionally,

the standby generator units are housed within a self-sheltering enclosure that prevents the intrusion of storm water.

Diesel fuel will be delivered on an as-needed basis in a compartmentalized tanker truck with maximum capacity of approximately 17,500 gallons. The tanker truck parks on the access road to the west of the generator yard and extends the fuel fill hose through one of multiple hinged openings in the security fence surrounding the generator equipment yard or via a centralized fueling station located on the exterior of the security fence.

To minimize spills during re-fueling, the generator has a small spill catch basin located at each fill port for the generators. To prevent a release from entering the storm drain system, storm drains will be temporarily blocked off by the truck driver and/or facility staff during fueling events. Rubber pads or similar devices will be kept in the generation yard to allow quick blockage of the storm sewer drains during fueling events.

To further minimize the potential for diesel fuel to come into contact with stormwater, to the extent feasible, fueling operations will be scheduled at times when storm events are improbable. Warning signs and/or wheel chocks will be used in the loading and/or unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed transfer lines. An emergency pump shut-off will be utilized if a pump hose breaks while fueling the tanks. Tanker truck loading and unloading procedures will be posted at the loading and unloading areas.
Diesel Exhaust Fluid (DEF) is used as part of the diesel engine combustion process to meet the emissions requirements. Each enclosure will have a 550-gallon DEF gallon tank. Dosing is addressed at each generator within the enclosure.

Neither the CABGF nor the CADC will store, use, or handle any hazardous material subject to the CalARP Program that would trigger the requirement for an off-site consequences analysis and a Risk Management Plan. **(Less than Significant Impact)**

Trimble Substation Expansion and PG&E Transmission Line

PG&E is responsible for operation of the Trimble Substation Expansion and transmission line. Operation of the transmission line would not involve the use of hazardous materials. The Trimble Substation Expansion would utilize hazardous materials such as mineral oils in the transformers and lead-acid batteries for backup power. PG&E substations are equipped with a containment system, such as an impervious liner and an open or gravel-filled sump basin, designed to capture potential leaks or spills of mineral oil. These containment features would be designed consistent with a required SPCC Plan. Batteries in PG&E substations are installed with secondary containment beneath and around the battery racks. The secondary containment system would be designed consistent with the California Fire Code Section 1207 requirements for stationary storage battery systems. PG&E must comply with applicable state and federal laws, regulations, and requirements pertaining to hazardous materials and hazardous wastes.

Adherence to all applicable state and federal laws would ensure that impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant. **(Less than Significant Impact)**

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Demolition

Demolition of existing structures would only occur at the CABGF/CADC Site. As described in Section 4.9.1.2 Existing Conditions, ACMs and lead-based paint may be present on the CABGF/CADC Site. Demolition of the existing buildings on the CABGF/CADC Site could expose construction workers or residents in the vicinity of the project site to harmful levels of ACMs or lead. The following measures are included in the Project as PDMs to reduce impacts to the presence of ACMs and/or lead-based paint:

PDM HAZ-1.1: In conformance with State and local laws, a visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site buildings to determine the presence of asbestos-containing materials and/or lead-based paint.

PDM HAZ-1.2: Prior to demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, California Code of Regulations (CCR) 1523.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the waste being disposed.

PDM HAZ-1.3: All potentially friable asbestos containing materials ("ACMs") shall be removed in accordance with National Emission Standards for Hazardous Air Pollutants guidelines prior to any building demolition or renovation that may disturb the materials. All demolition activities will be undertaken in accordance with Cal/OSHA standards contained in Title 8 of CCR, Section 1529, to protect workers from exposure to asbestos.

PDM HAZ-1.4: A registered asbestos abatement contractor shall be retained to remove and dispose of ACMs identified in the asbestos survey performed for the site in accordance with the standards stated above.

PDM HAZ-1.5: Materials containing more than one percent asbestos are also subject to Bay Area Air District (Air District) regulations. Removal of materials containing more

than one percent asbestos shall be completed in accordance with Air District requirements.

Conformance with aforementioned regulatory requirements and PDMs 1.1 through 1.5 will result in a less than significant impact from ACMs and lead. **(Less than Significant Impact)**

Soil Contamination

As described in Section 4.9.1.2 Existing Conditions, there are no RECs on the CABGF/CADC Site; however, there is one CREC and one HREC on the Trimble Substation Expansion Site associated with previous agricultural uses. Due to the past agricultural and industrial history of the Project area, which includes previous releases of contaminated materials into soil and groundwater, residual agricultural and industrial contaminants may be present in subsurface soil that could adversely affect construction workers, adjacent properties, and future site workers if disturbed. Two former agricultural wells are located in the northwestern portion of the site. Abandoned wells can act as a conduit for the vertical migration of groundwater contamination, should it be present in groundwater beneath the site. If groundwater levels rise, an abandoned well can become an artisan well with uncontrolled water flow that can adversely impact future development.

For the CABGF/CADC and Trimble Substation Expansion Sites, the following measures are included in the Project as PDMs to reduce hazardous materials impacts to a less than significant level. The following PDMs would not apply to the off-site multi-modal improvements since no ground-disturbing construction activities are assumed to occur.

PDM HAZ-2.1: If potentially contaminated soil is discovered during construction activities, soil testing shall be performed to determine whether a Site Management Plan (SMP) shall be prepared. If soil testing identifies contaminants in areas of the Project Site to be disturbed that exceed both published naturally occurring background levels and applicable environmental screening levels (ESL) for the protection of future commercial/industrial workers published by the San Francisco Bay Regional Water Quality Control Board (RWQCB), the Project applicant shall be required to prepare and submit a SMP.

Components of the SMP (if required) shall include, but shall not be limited to:

- A detailed discussion of the site background;
- A description of either capping soils or removal and hauling soils off-site to a licensed non-hazardous or hazardous materials disposal site based on environmental testing of the soil.
- Notification procedures if previously undiscovered significantly impacted soil or free fuel product is encountered during construction;

- Development of cleanup levels as based on Section 4.25.2.3 of the RWQCB's The Water Quality Control Plan for the San Francisco Bay Basin (March 2023, Basin Plan);
- Sampling and laboratory analyses of excess soil requiring disposal at an appropriate off- site waste disposal facility;
- Soil stockpiling protocols; and
- Protocols to manage groundwater that may be encountered during trenching and/or subsurface excavation activities.

The SMP shall be submitted to the RWQCB, Santa Clara County Environmental Health Department, California Department of Toxic Substances Control, or equivalent regulatory agency for review and/or approval (if required). Copies of the approved SMP shall be provided to the Director of Planning, Building, and Code Enforcement or the Director's designee and the Environmental Compliance Officer in the City of San José Environmental Services Department prior to the issuance of any demolition, grading and/or building permits (whichever occurs earliest).

PDM HAZ-2.2: Prior to the issuance of any demolition, grading and/or building permits (whichever occurs earliest), all contractors and subcontractors at the project site shall develop a Health and Safety Plan (HSP) specific to their scope of work and based upon the known environmental conditions for the site prior to project construction. The HSP shall be prepared by an industrial hygienist. The HSP shall be submitted to the Director of Planning, Building and Code Enforcement, or their designee, and the Environmental Compliance Officer in the City of San José Environmental Services Department and implemented under the direction of a Site Safety and Health Officer. The HSP shall include, but shall not be limited to, the following elements, as applicable:

- A description of potential health and safety hazards;
- A description of applicable regulations and standards to be implemented for the project site;
- Provisions for personal protection and monitoring exposure to construction workers;
- Education for workers in the proper use of personnel protection;
- Provisions for Hazard Communication Standard (HAZCOM) worker training and education including information about HAZCOM labeling,
- Copies of Safety Data Sheets for any hazardous materials that may be used on-site;

- Identification of workers, supervisor, and employer health and safety responsibilities; and
- Provisions for the on-site management and/or treatment of contaminated groundwater during extraction or dewatering activities; and
- A description of emergency procedures and identification of responsible personnel to contact in event of an emergency. Include contact information for responsible personnel and other emergency contact numbers.
- Copies of the approved HSPs shall be kept at the Project Site.

PDM HAZ-2.3: Prior to issuance of any grading permits, the Project Owner shall research well records from Valley Water to locate abandoned wells at the site. If the wells are identified, or subsequently encountered during earthwork activities, the wells shall be properly destroyed in accordance with Valley Water Ordinance 90-1.

For the proposed transmission line routes, PG&E would implement the following avoidance and minimization measures, as applicable, from the PG&E Operations and Maintenance Incidental Take Permit FEIR[121]:

> APM HAZ-1 Spill Response. PG&E will implement its hazardous substance control and emergency response procedures as needed. The procedures identify methods and techniques to minimize the expose of the public and site workers to potentially hazardous materials during all phases of construction through operation. They address worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill control practices for construction and materials stored on site. If it is necessary to store chemicals on site, they will be managed in accordance with all applicable regulations. Material safety data sheets shall be maintained and kept available on site, as applicable.
>
> In the event that soils suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during site grading activities or excavation activities, the excavated soil will be tested and, if contaminated above hazardous waste levels, will be contained and disposal of at a licensed waste facility. The presence of suspected contaminated soil will require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.

[121] California Department of Fish and Wildlife. PG&E Bay Area O&M Incidental Take Permit Environmental Impact Report Volume 2. Final EIR. June 2022.

All hazardous materials and hazardous wastes shall be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following:

- Proper disposal of potentially contaminated soils.
- Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources.
- Emergency response and reporting procedures to address hazardous material spills.
- Stopping work and contacting the local fire department or other agencies as appropriate. Work will resume after any necessary consultation and approval by the local fire department.
- Emergency-spill response and clean up kits will be on site where they are immediately available to respond to an accidental release of a hazardous fluid or material. If applicable, a Stormwater Pollution Prevention Plan (SWPPP) will be implemented, which will also address spill response and other site-specific physical conditions to improve hazard prevention.

With implementation of PDM HAZ-2.1, PDM HAZ-2.2, and PDM HAZ-2.3 described above, as well as PG&E programmatic measure APM HAZ-1, the proposed Project would result in a less than significant impact due to potentially contaminated soil and groundwater any on-site as contamination would be addressed via a SMP and HSP or other required measures. **(Less than Significant Impact)**

Project Operation

As described in the discussion under checklist question a), a SPCC Plan would be required to be completed for the safe storage and use of chemicals at the CABGF/CADC and Trimble Substation Expansion Sites. Conformance with relevant laws and regulations would minimize the likelihood of hazardous material releases from the CABGF/CADC and Trimble Substation Expansion Sites. No hazardous materials releases are anticipated for the transmission lines or the off-site multi-modal improvements. **(Less than Significant Impact)**

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The proposed Project will be located approximately 0.8 mile southwest of the nearest school, Orchard Elementary School. Therefore, the Project will not emit hazardous emissions or handle hazardous materials, substances, or waste within a quarter mile of an existing or proposed school. **(No Impact)**

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As discussed in Section 4.9.1.2 Existing Conditions, the Project Component Sites are not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As discussed under checklist question a), the Project, with the implementation of PMD HAZ-1.1, PDM HAZ-1.2, PG&E programmatic measure APM HAZ-1, along with the Project's SPCC Plan, would not emit significant hazards or hazardous materials impacts from construction or operation. Therefore, the Project would not create a significant hazard to the public or environment. **(Less than Significant Impact)**

e) If located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The Project Component Sites are located within two miles of a public airport or public use airport. As discussed in Section 4.9.1.2 Existing Conditions, the San José Mineta International Airport is located approximately one mile southwest of the Project Component Sites. The Project Component Sites are located outside the noise contours of these airports and would not be located within the airport safety zones.[122] For these reasons, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. **(No Impact)**

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City's 2024 EOP is principally designed to establish the foundational policies and procedures that define how the City will effectively prepare for, respond to, recover from, and mitigate against natural or human-caused disasters. This includes assigning City departmental roles and responsibilities during disaster response and recovery activities, establishing communication and coordination procedures, and the logistics for disseminating information and resources, among other similar items.

The CABGF/CADC would develop an industrial site consistent with the existing General Plan designation on the site and would not alter evacuation routes. In addition, the CABGF/CADC would be constructed in accordance with current building and fire codes and would be required to be maintained in accordance with applicable City policies identified in the General Plan FEIR to avoid unsafe building conditions. Therefore, the CABGF/CADC would be consistent with existing emergency response plans and emergency evacuation plans.

[122] City of San José. *Public GIS Viewer.* Accessed April 13, 2026. https://gis.sanjoseca.gov/maps/publicgisviewer/

The Trimble Substation Expansion would install electric infrastructure on a currently vacant property and would not create barriers to evacuation or emergency response, nor would it add population to the site that would need to evacuate in the event of an emergency.

The transmission line routes would be within the right-of-way of existing roadways and would not modify any of the roadways that would obstruct emergency vehicles or remove access.

For these reasons, construction and operation of the Project would not impair implementation of or physically interfere with the City's adopted EOP. **(Less than Significant Impact)**

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

As discussed in Section 4.9.1.2 Existing Conditions, the Project Component Sites are not located in or near state responsibility areas or lands classified as very high fire hazard severity zones Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. **(No Impact)**

4.9.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant hazards and hazardous materials impact?

The geographic area for cumulative hazards and hazardous materials impacts is the CABGF/CADC Site, Trimble Substation Expansion Site, PG&E transmission line routes, and the immediate vicinity. As described in the discussion under checklist question a), the proposed Project would include the use and storage of diesel fuel for testing and maintenance of the backup generators associated with the data center. A Hazardous Materials Business Plan would be required to be completed for the safe storage and use of chemicals and a SPCC would be implemented. Conformance with relevant laws and regulations would minimize the likelihood of hazardous material releases from the Project and ensure the Project would not result in or substantially contribute to a significant cumulative impact related to the use and storage of hazardous materials.

No significant cumulative impacts associated with hazardous materials or contaminated soil/groundwater has been identified in the immediate project vicinity. The Project would implement PDMs as well as adhere to all applicable laws and regulations with respect to the remediation of existing soil and groundwater contamination on the Project Site, thereby reducing contamination in the Project vicinity. The Project would not result in or substantially contribute to a cumulative impact related to soil and groundwater contamination. **(Less than Significant Cumulative Impact)**

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the Environmental Protection Agency (EPA) and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the Regional Water Quality Control Boards (RWQCBs). The Project Component Sites are within the jurisdiction of the San Francisco Bay RWQCB.

Under Section 303(d) of the federal Clean Water Act, the SWRCB and RWQCBs are required to identify impaired surface water bodies that do not meet water quality standards and develop total maximum daily loads for contaminants of concern. The list of the state's identified impaired surface water bodies, known as the "303(d) list" can be found on the on the SWRCB's website.[123]

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas. A Special Flood Hazard Areas is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes

[123] California State Water Resources Control Board. "2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." May 11, 2022. Accessed March 2, 2026. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Regional and Local

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.3

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in May 2022 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.[124] Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures be properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if: (1) the post-project impervious surface area is less than, or the same as, the pre-project impervious surface area; (2) the project is located in a catchment that drains to a hardened (e.g., continuously lined with concrete) engineered channel or channels or enclosed pipes, which extend continuously to the Bay, Delta, or flow-controlled reservoir, or, in a catchment that drains to channels that are tidally influenced; or

[124] California Regional Water Quality Control Board San Francisco Region. Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008. May 11, 2022.

(3) the project is located in a catchment or subwatershed that is highly developed (i.e., that is 70 percent or more impervious).[125]

Municipal Regional Permit Provision C.12.f

Provision C.12.f of the MRP requires co-permittee agencies to implement a control program for PCBs that reduces PCB loads by a specified amount during the term of the permit, thereby making substantial progress toward achieving the urban runoff PCBs wasteload allocation in the Basin Plan by March 2030.[126] Programs must include focused implementation of PCB control measures, such as source control, treatment control, and pollution prevention strategies. Municipalities throughout the Bay Area are updating their demolition permit processes to incorporate the management of PCBs in demolition building materials to ensure PCBs are not discharged to storm drains during demolition. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit. Single-family residential and wood frame structures are exempt.

Water Resources Protection Ordinance and District Well Ordinance

Valley Water operates as the flood control agency for Santa Clara County. Valley Water also provides stream stewardship and is the wholesale water supplier throughout the county, which includes the groundwater recharge program. Well construction and deconstruction permits, including borings 45 feet or deeper, are required under Valley Water's Well Ordinance 90-1. Under Valley Water's Water Resources Protection Ordinance, projects within Valley Water property or easements are required to obtain encroachment permits.

2021 Groundwater Management Plan

The 2021 Groundwater Management Plan (GWMP) describes Valley Water's comprehensive groundwater management framework, including existing and potential actions to achieve basin sustainability goals and ensure continued sustainable groundwater management. The GWMP covers the Santa Clara and Llagas subbasins, which are located entirely in Santa Clara County. Valley Water manages a diverse water supply portfolio, with sources including groundwater, local surface water, imported water, and recycled water. About half of the county's water supply comes from local sources and the other half comes from imported sources. Imported water includes the District's State Water Project and Central Valley contract supplies and supplies delivered by the San Francisco Public Utilities Commission (SFPUC) to cities in northern Santa Clara County. Local sources include natural groundwater recharge and surface water supplies. A small portion of the county's water supply is recycled water.

[125] The Hydromodification Applicability Maps developed the permittees under Order No. R2-2009-0074 were prepared using this standard, adjusted to 65 percent imperviousness to account for the presence of vegetation on the photographic references used to determine imperviousness. Thus, the maps for Order No. R2-2009-0074 are accepted as meeting the 70 percent requirement.

[126] California Regional Water Quality Control Board San Francisco Region. *Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS61200*. May 11, 2022.

Local groundwater resources make up the foundation of the county's water supply, but they need to be augmented by the District's comprehensive water supply management activities to reliably meet the county's needs. These include the managed recharge of imported and local surface water and in-lieu groundwater recharge through the provision of treated surface water and raw water, acquisition of supplemental water supplies, and water conservation and recycling.[127]

Post-Construction Urban Runoff Management (City Council Policy No. 6-29)

The City of San José's Policy No. 6-29 implements the stormwater treatment requirements of Provision C.3 of the MRP. City Council Policy No. 6-29 requires new development and redevelopment projects to implement post-construction Best Management Practices (BMPs) and Treatment Control Measures (TCMs). This policy also established specific design standards for post-construction TCMs for projects that create or replace 10,000 square feet or more of impervious surfaces.

Post-Construction Hydromodification Management (City Council Policy No. 8-14)

The City of San José's Policy No.8-14 implements the hydromodification management requirements of Provision C.3 of the MRP. Policy No. 8-14 requires new development and redevelopment projects that create or replace one acre or more of impervious surface area and are located within a subwatershed that is less than 65 percent impervious, to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt generation, or other impacts to local rivers, streams, and creeks. The policy requires these projects to be designed to control project-related hydromodification through a Hydromodification Management Plan (HMP). Projects that do not meet the minimum size threshold, drain into tidally influenced areas or directly into the Bay, or are infill projects in subwatersheds or catchment areas that are greater than or equal to 65 percent impervious would not be subject to the HMP requirement.

Construction Dewatering Waste Discharge Requirements

Each of the RWQCBs regulate construction dewatering discharges to storm drains or surface waters within its Region under the NPDES program and Waste Discharge Requirements.

Envision San José 2040 General Plan

The General Plan includes the following hydrology and water quality policies applicable to the proposed project.

[127] Valley Water. *2021 Groundwater Management Plan, Santa Clara and Llagas Subbasins.* November 2021.

Policy	Description
ER-8.1	Manage stormwater runoff in compliance with the City's Post-Construction Urban Runoff (6-29) and Hydromodification Management (8-14) Policies.
ER-8.3	Ensure that private development in San José includes adequate measures to treat stormwater runoff.
ER-8.5	Ensure that all development projects in San José maximize opportunities to filter, infiltrate, store and reuse or evaporate stormwater runoff on-site.
ER-10.5	Protect groundwater recharge areas, particularly creeks and riparian corridors.
EC-4.1	Design and build all new or remodeled habitable structures in accordance with the most recent California Building Code and municipal code requirements as amended and adopted by the City of San José, including provisions for expansive soil, and grading and stormwater controls.
EC-5.7	Allow new urban development only when mitigation measures are incorporated into the project design to ensure that new urban runoff does not increase flood risks elsewhere.
EC-5.16	Implement the Post-Construction Urban Runoff Management requirements of the City's Municipal NPDES Permit to reduce urban runoff from project sites.
EC-7.10	Require review and approval of grading, erosion control and dust control plans prior to issuance of a grading permit by the Director of Public Works on sites with known soil contamination. Construction operations shall be conducted to limit the creation and dispersion of dust and sediment runoff.
IN-3.9	Require developers to prepare drainage plans that define needed drainage improvements for proposed developments per City standards.

North San José Floodplain Management Policy

Properties north of US 101 in San José are subject to the North San José Floodplain Management Policy, which requires properties to restrict the amount of their property that would block flows from a 100-year flood event.

4.10.1.2 *Existing Conditions*

CABGF/CADC Site

Hydrology and Drainage

The water quality of streams, creeks, ponds, and other surface water bodies can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from unidentified sources, known as "non-point" source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. Coyote Creek flows south to north approximately 0.4 miles

northeast of the CABGF/CADC Site. According to the EPA, Coyote Creek is currently listed on the 303(d) list of impaired waterways for low oxygen, mercury, pesticides, and total toxic chemicals.[128]

The existing CABGF/CADC Site is currently developed with five multi-tenant buildings and is improved with asphalt-paved parking areas and driveways, concrete-paved loading docks, associated landscaping, drainage features, perimeter fencing, and dumpster and equipment enclosures. There are existing storm drain lines located in Zanker Road and Character Avenue and a storm drain line and easement that crosses the Site west to east.

Flooding

The CABGF/CADC Site is located within the FEMA Flood Zone X[129], which is an area of 0.1 percent annual chance of flood with average depth of less than one foot or with drainage areas of less than one square mile.

Seiches and Tsunamis

A seiche is the oscillation of water in an enclosed body of water such as a lake or the San Francisco Bay. There are no landlocked bodies of water near the CABGF/CADC Site that would affect the site in the event of a seiche.

A tsunami is a sea wave generated by an earthquake, landslide, or other large displacement of water in the ocean. There are no bodies of water near the CABGF/CADC Site that would affect the site in the event of a tsunami.[130]

Groundwater

The CABGF/CADC Site is located within the Santa Clara Subbasin in a confined area.[131,132] Groundwater was encountered at the CABGF/CADC Site at depths between 6 and 11 feet bgs.[133]

[128] EPA. "How's My Waterway?" Accessed March 2, 2026. https://mywaterway.epa.gov/community/5977%20Silver%20Creek%20Valley%20Rd,%20San%20Jose,%20CA,%2095138,%20USA/overview

[129] City of San José. "Public GIS Viewer." Accessed April 24, 2026. https://gis.sanjoseca.gov/maps/publicgisviewer/

[130] California Department of Conservation. "Tsunami Hazard Area Map." Accessed April 24, 2026. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/.

[131] Valley Water. *2021 Groundwater Management Plan*. Figure 2-1. November 2021.

[132] Valley Water. "SCVWD Groundwater Subbasins." Accessed April 24, 2026. https://data-valleywater.opendata.arcgis.com/maps/7c3f7808407045f88ae1d83d692c8be5/about

[133] Partner Engineering and Science, Inc. *Phase I Environmental Site Assessment Report 326-346 Charcot Avenue; 309-391 East Brokaw Road; and 2012-2156 Zanker Road.* September 8, 2025.

Trimble Substation Expansion Site

Hydrology and Drainage

The Trimble Substation Expansion site is undeveloped. There is an existing 54-inch storm drain line in N. First Street.

Flooding

The Trimble Substation Expansion Site is located within the FEMA Flood Zone X.[134] The site is also located within the North San José Floodplain Management Policy area and is mapped in an area of 90 percent blockage, which means at least 10 percent of the site needs to remain open to allow flood flows through.[135]

Seiches, Tsunamis, and Mudflows

There are no landlocked bodies of water near the Trimble Substation Expansion Site that would affect the site in the event of a seiche.

There are no bodies of water near the Trimble Substation Expansion Site that would affect the site in the event of a tsunami.[136]

The Trimble Substation Expansion Site is not susceptible to mudflows.

Groundwater

The Trimble Substation Expansion Site is located within the Santa Clara Subbasin in a confined area.[137,138] Groundwater at the Trimble Substation Expansion Site is estimated at a depth of roughly 10 feet bgs.[139]

PG&E Transmission Line Routes

Flooding

The PG&E transmission line routes are located within Flood Zones X, AH, and AO.[140] Flood Zone AH is defined as areas with a one percent annual chance of shallow flooding, usually in the form of a

[134] Federal Emergency Management Agency. *FIRM Map 06085C0068J.* February 19, 2014.
[135] City of San José. "Public GIS Viewer." Accessed October 22, 2026. https://gis.sanjoseca.gov/maps/publicgisviewer/.
[136] California Department of Conservation. "Tsunami Hazard Area Map." Accessed March 2, 2026. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/.
[137] Valley Water. *2021 Groundwater Management Plan*. Figure 2-1. November 2021.
[138] Valley Water. "SCVWD Groundwater Subbasins." Accessed April 24, 2026. https://data-valleywater.opendata.arcgis.com/maps/7c3f7808407045f88ae1d83d692c8be5/about
[139] SECOR International Incorporated. Phase I ESA of Agilant's Undeveloped Parcels A, B, and C Located Adjacent to Agilent Technologies, Inc., 350/370 Trimble Road. July 26, 2000. https://permits.sanjoseca.gov/api/public-portal/permit/document?docId=9490519.
[140] Federal Emergency Management Agency. *FIRM Map 06085C0068J/06085C0231H.* February 19, 2014/May 18, 2009.

pond, with an average depth ranging from one to three feet. Flood Zone AO is defined as areas with a one percent or greater chance of shallow flooding each year, usually in the form of sheet flow, with an average depth ranging from one to three feet.

Seiches and Tsunamis

There are no landlocked bodies of water near the PG&E transmission line routes and the off-site multi-modal improvements that would affect the site in the event of a seiche.

There are no bodies of water near the PG&E transmission line and the off-site multi-modal improvements that would affect the site in the event of a tsunami.[141]

Groundwater

The PG&E transmission line routes are located within the Santa Clara Subbasin in a confined area recharge area.[142,143]

4.10.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
- result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐

[141] California Department of Conservation. "Tsunami Hazard Area Map." Accessed March 2, 2026. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/.
[142] Valley Water. *2021 Groundwater Management Plan*. Figure 2-1. November 2021.
[143] Valley Water. "SCVWD Groundwater Subbasins." Accessed March 2, 2026. https://data-valleywater.opendata.arcgis.com/maps/7c3f7808407045f88ae1d83d692c8be5/about

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
- substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
- create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
- impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
Would the project result in a cumulatively considerable contribution to a cumulatively significant hydrology and water quality impact?	☐	☐	☒	☐

4.10.2.1 *Project Impacts*

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction-Related Water Quality Impacts

Construction activities, such as grading and excavation, may result in temporary impacts to surface water quality in local waterways. When disturbance to underlying soil occurs, surface water that flows across the site may contain sediments may be dislodged and discharged to the storm drainage system.

CABGF/CADC

Construction of the CABGF/CADC will disturb over 12 acres, which requires that the Project obtain a NPDES General Permit for Construction. Prior to initiating grading activities, the Project Applicant will file a Notice of Intent with the SWRCB and prepare a SWPPP prior to commencement of construction to establish methods for controlling discharge associated with construction activities. Additionally, all development projects in San José are also required to comply with the City of San

Jose's Grading Ordinance regardless of whether the Project is required to obtain an NDPES General Construction Permit.[144] Consistent with the City's General Plan policies to reduce construction-related water quality impacts, the following measures, based on City Standard Permit Conditions, would be implemented and are incorporated as PDM HYD-1.1.

PDM HYD-1: **Stormwater Best Management Practices.** Consistent with applicable provisions of the General Plan and standard permit conditions, the following measures shall be implemented to prevent stormwater pollution and minimize potential sedimentation during construction include, but are not limited, to the following:

- Burlap bags filled with drain rock shall be installed around storm drains to route sediment and other debris away from the drains.
- Earthmoving or other dust-producing activities shall be suspended during periods of high winds and when other dust reducing measures are ineffective.
- All exposed or disturbed soil surfaces shall be watered at least twice daily to control dust, as necessary.
- Stockpiles of soil or other materials that can be blown by the wind shall be watered or covered.
- All trucks hauling soil, sand, and other loose materials shall be covered and all trucks shall maintain at least two feet of freeboard.
- All paved access roads, parking areas, staging areas, and residential streets adjacent to the construction sites shall be swept daily (with water sweepers).
- Vegetation in disturbed areas shall be replanted as quickly as possible.
- All unpaved entrances to the Project Site shall be filled with rock to remove mud from tires prior to entering City streets. A tire wash system shall be installed if requested by the City.
- The Project Applicant shall comply with the City of San José Grading Ordinance, including implementing erosion and dust control during site preparation and with the applicable City of San José Zoning Ordinance requirements for keeping adjacent streets free of dirt and mud during construction.

As discussed in Section 3.5, maximum cut depths are estimated to be 10 feet below existing grade. Groundwater depths at the CABGF/CADC Site range between 8.5 and 10 feet bgs. Therefore, it is anticipated that groundwater will be encountered and the Project will require dewatering.

[144] The San José Grading Ordinance requires the use of erosion and sediment controls to protect water quality when a site is under construction.

Construction dewatering discharges to storm drains or surface waters is regulated by the RWQCB under the NPDES program and Waste Discharge Requirements. **(Less than Significant Impact)**

Trimble Substation Expansion and PG&E Transmission Lines

Construction of the Trimble Substation Expansion will disturb roughly 10 acres, which requires that PG&E obtain a NPDES General Permit for Construction. Also, as described in Section 3.5.4.1 Trimble Substation Expansion, PG&E will comply with the City's requirements, such as the City of San José's Grading Ordinance.

The Trimble Substation Expansion will loop in and extend the existing Los Esteros–Trimble 115 kV and Montague–Trimble 115 kV double circuit power line into the facility via two new TSPs within the existing PG&E right of way. PG&E has identified three potential transmission routes that will connect the CADC to the proposed Trimble Substation Expansion. The transmission line will either be overhead or underground and constructed entirely within the public right-of-way. PG&E would be required to comply with BMP 62 for the transmission lines, an avoidance and minimization measure from the Bay Area HCP related to water quality. This regulatory requirement would reduce water quality impacts during construction as the measures prevent the discharge of stormwater pollutants and minimize erosion. **(Less than Significant Impact)**

Post-Construction Impacts

CABGF/CADC

Construction of the CABGF/CADC will result in the replacement of more than 5,000 square feet of impervious surface at the Project Site. Therefore, the Project would be required to comply with Provision C.3 of the MRP. This requires the project to incorporate site design, source control and runoff treatment controls to reduce the rates, volumes and pollutant loads of runoff from the project. The MRP requires all post-construction stormwater runoff to be treated by numerically sized LID treatment controls, such as biotreatment facilities, unless the project is granted Special Project LID Reduction Credits, which would allow the project to implement non-LID measures for all or a portion of the site depending on the project characteristics. In addition to the requirements of Provision C.3, the CABGF/CADC would be subject to the City's Post-Construction Urban Runoff Management Policy (Policy 6-29).

As described under Section 3.5.7, the CABGF/CADC would include the construction of LID bioretention areas totaling approximately 15,300 square feet. These stormwater treatments would promote on-site infiltration and reduce stormwater runoff on-site. With the implementation of stormwater treatment measures, the Project would comply with the City's stormwater management requirements and result in a less than significant impact on water quality. Therefore, the proposed CABGF/CADC would result in less than significant impacts on runoff and groundwater post-construction. **(Less than Significant Impact)**

Trimble Substation Expansion and PG&E Transmission Lines

Construction of the substation expansion will result in the replacement of more than 5,000 square feet of impervious surface. Therefore, PG&E will be required to comply with Provision C.3 of the MRP. The MRP requires all post-construction stormwater runoff to be treated by numerically sized LID treatment controls, such as biotreatment facilities, unless the project is granted Special Project LID Reduction Credits, which would allow the project to implement non-LID measures for all or a portion of the site depending on the project characteristics. Additionally, PG&E will comply with the City's Post-Construction Urban Runoff Management Policy as described in Section 3.5.4.1 Trimbl.

The PG&E transmission line will not result in significant water quality impacts post construction. The transmission line will be either underground or overhead and will be located entirely within the public right of way or within existing PG&E easements on private property currently developed with paved parking areas.

As documented above, the Project will not impact water quality with the implementation of the Construction General Permit requirements, as well as PDM HYD-1. **(Less than Significant Impact)**

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The proposed Project is located within the Santa Clara Subbasin, one of two groundwater basins located within the City of San José Urban Growth Boundaries. The Santa Clara Subbasin has not been identified as a groundwater basin in a state of overdraft, as the Valley Water District actively manages the aquifer by importing water for recharge. As described in Section 4.10.1.2 Existing Conditions, the Project Component Sites are not located within a groundwater recharge area.

Although the Project will increase the demand for water (refer to Section 4.19 Utilities and Service Systems for a discussion of the Project's water demand) within the City compared to existing conditions, water demand resulting from the proposed Project will remain consistent with what is anticipated in the General Plan and the Urban Water Management Plan (UWMP). Further, as discussed in Section 3.5.10.2, the CADC will use air cooled chillers for cooling needs of the data center, which reduces the need for water since the cooling system will not use water for evaporation. For these reasons, the Project would not establish groundwater wells to supply the site, deplete groundwater supply, or interfere with groundwater recharge. **(Less than Significant Impact)**

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

CABGF/CADC

Construction of the CABGF/CADC would reduce the amount of impervious surfaces on the site by 137,577 square feet. The Project will not alter the course of a stream or river since no waterways are on-site.

Post-construction stormwater runoff from the Project's impervious surfaces will be directed towards bioretention areas located around the perimeter of the site and adjacent to paved parking areas, consistent with the MRP and City of San José Policy 6-29. The proposed bioretention areas will remove pollutants and minimize the rate and volume of runoff from the Site, reducing the potential for runoff, erosion or siltation on and off-site. Additionally, the Project's proposed bioretention areas would allow percolation of stormwater into the ground and reduce the rate of stormwater runoff entering the City's storm drainage system.

With adherence to the requirements of Provision C.3 of the MRP and the City's Standard Permit Conditions, the Project would not create substantial new sources of polluted runoff. Finally, the Project will be required to manage erosion and sedimentation during construction in accordance with the City's Municipal Code and the Construction General Permit.

Trimble Substation Expansion and PG&E Transmission Line

PGE&E will be required to comply with Provision C.3 of the MRP. In addition, PG&E will comply with the City's Grading Ordinance, North San José Floodplain Management Policy, and Post-Construction Urban Runoff Management Policy to manage stormwater runoff. With adherence to the requirements of Provision C.3 of the MRP, PDM HYD-1.1, and local City policies, the Project will not create substantial new sources of polluted runoff. The Project will implement LID stormwater treatment controls to treat post-construction stormwater runoff. Finally, the Project would be required to manage erosion and sedimentation during construction in accordance with the City's Municipal Code and the Construction General Permit. **(Less than Significant Impact)**

d) Would the project risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?

The Project Component Sites are not located near a large body of water and would not be subject to a seiche or tsunami. The CABGF/CADC and Trimble Substation Expansion Sites are located within the FEMA Flood Zone X, which is a zone that does not contain the 100-year floodplain. Portions of the PG&E transmission line routes are located within FEMA Flood Zones AH and AO; however, the transmissions line would either be underground or overhead above any future flood level. Thus, there would be minimal risk of a release of pollutants from the transmission lines.

As discussed under checklist question a) in Section 4.9 Hazards and Hazardous Materials, the Project will prepare a SPCC Plan in accordance with applicable laws and regulations to address the storage, use and delivery of hazardous materials. Additionally, the Project will be required to comply with the City's Post-Construction Urban Runoff Policy 6-29 and Provision C.3 of the RWQCB Municipal Regional NPDES Permit requirements to reduce the impacts of stormwater runoff on post-construction water quality [refer to checklist question a)]. For these reasons, the Project will result in a less than significant risk for releasing pollutants due to inundation. **(Less than Significant Impact)**

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Water Quality Control

As discussed in checklist question a), the Project will comply with the City's Post-Construction Urban Runoff Policy 6-29 and Provision C.3 of the RWQCB MRP requirements and would implement PDMs (such as PDM HYD-1.1) addressing construction- and operational-related surface runoff quality. Thus, the Project will not conflict with or obstruct implementation of the San Francisco Bay Basin Plan.

Santa Clara Plain and Llagas Subbasin Groundwater Management Plan

As discussed in checklist question b), the Project Site is within the Santa Clara Plain groundwater subbasin, and this subbasin has not been identified in the GWMP as being overdrafted. Implementation of the Project will not interfere with any actions set forth by Valley Water in its GWMP regarding groundwater recharge, transport of groundwater, and/or groundwater quality. As discussed under checklist question b), the Project will not substantially decrease groundwater supplies or substantially interfere with groundwater recharge. The Project will include LID stormwater management treatment tools, such as bioretention basins, to control runoff on-site. Therefore, implementation of the Project would not interfere with any actions set forth by Valley Water in its GWMP regarding groundwater recharge, transport of groundwater, and/or groundwater quality.

For these reasons, with compliance with the regional and local regulatory requirements, the Project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

4.10.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant hydrology and water quality impact?

Build-out of the proposed Project and other projects in the cumulative scenario would involve redevelopment of existing developed and vacant sites with impervious surfaces, and these cumulative projects would be required to conform to applicable General Plan goals, policies, and action statements as well as all other applicable laws and regulations regarding stormwater runoff, infrastructure and flooding. The proposed Project would reduce the amount of stormwater runoff from the CABGF/CADC Site and would increase stormwater runoff at the Trimble Substation Expansion Site but would be required to comply with the Construction General Permit to reduce potential surface and groundwater quality impacts during construction. In addition, the Project would manage future stormwater runoff from the Project Component Sites using LID-based treatment methods, in compliance with Provision C.3 of the MRP. Cumulatively, other projects of similar scale in San José in the Coyote Creek watershed would also be required to adhere to General Plan policies, standard permit conditions, and existing regulations to ensure hydrology and water quality impacts are avoided or minimized. The existing policies and regulations would reduce the hydrology and water quality impacts of the proposed Project and cumulative projects in the area; therefore, the Project would not result in significant cumulative impacts to hydrology and water quality. **(Less than Significant Cumulative Impact)**

4.11 Land Use and Planning

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

Local

Envision San José 2040 General Plan and Municipal Code

The Project Component Sites are designated as Industrial Park (IP) per the General Plan. This land use designation allows for a variety of industrial uses, such as research and development, manufacturing, assembly, testing and offices. This designation is different than Light Industrial and Heavy Industrial designations since Industrial Park uses are limited to those for which the functional or operational characteristics of a hazardous or nuisance nature can be mitigated through design controls.

The Project Component Sites are located in the IP zoning district. The IP zoning district (similar to the IP designation) is established with specific development standards intended to ensure development is compatible with surrounding uses and implements the site's General Plan land use designation. The City of San José's Zoning Ordinance permits data centers with a Special Use Permit and emergency generators with an Administrative Use Permit.

Airport Plans and Regulations

The San José Mineta International Airport is owned and operated by the City of San José. It is regulated by various federal, state, and local laws and regulations, including the Code of Federal Aviation Regulations. Part 77 of the Federal Aviation Regulations (FAR) regulate obstructions to navigable airspace, as described in Section 4.9 Hazards and Hazardous Materials of this SPPE. The Project Component Sites are not located within the AIA established by the Santa Clara County Airport Land Use Commission (ALUC) in its Comprehensive Land Use Plan (CLUP) for the airport. The AIA is a composite of areas surrounding the airport that are affected by noise, height, and safety considerations, and the CLUP sets forth standards and policies for land use compatibility with these airport considerations.

4.11.1.2 *Existing Conditions*

CABGF/CADC Site

The CABGF/CADC Project Site encompasses approximately 12.88 acres and is located at 326 Charcot Avenue on the southeast corner of the intersection of Charcot Avenue and Zanker Road in San Jose, California. The Site is currently developed with five light industrial and warehouse buildings and is improved with asphalt-paved parking areas and driveways, concrete-paved loading docks,

associated landscaping, drainage features, perimeter fencing, and dumpster and equipment enclosures.

Trimble Substation Expansion Site

The roughly 10-acre Trimble Substation Expansion Site is located approximately 0.5-mile west of the CABGF/CADC Site at the southwest corner of the Component Drive/N. First Street intersection. The Trimble Substation Expansion Site is currently undeveloped and covered in grasses and shrubs.

PG&E Transmission Line Routes

The PG&E transmission line routes would be located within the public right-of-way along Zanker Road, Charcot Avenue, Component Drive, N. First Street, E. Brokaw Road.

Surrounding Land Uses

The area surrounding the Project Components Sites consists primarily of commercial and industrial land uses.

4.11.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
Would the project result in a cumulatively considerable contribution to a cumulatively significant land use and planning impact?	☐	☐	☒	☐

4.11.2.1 *Project Impacts*

a) Would the project physically divide an established community?

A physical division of an established community typically refers to the construction of a physical feature (such as a wall, roadway, or railroad tracks) or the removal of a means of access (such as a

local roadway or bridge) that would impair mobility within an existing community or between communities.

As proposed, the Project would construct the proposed CABGF/CADC and Trimble Substation Expansion within existing established parcels, and the transmission line routes would be located in the public right of way . The proposed Project does not include any features that would physically divide the community (e.g., roadway, railway, or highway) or restrict movement within the surrounding community. The proposed Project would be similar in nature to the other industrial development in the Project area and would not physically divide an established community. **(Less than Significant Impact)**

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Consistency with General Plan and Municipal Code

The proposed Project would develop an approximately 12.88-acre CBAGF/CADC Site with an approximately 514,141 square foot data center building, substation, and other associated infrastructure to support the data center. A new PG&E substation expansion is proposed at the Trimble Substation Expansion Site and would connect to the proposed data center via proposed PG&E transmission lines. The Project would be consistent with the General Plan designation of IP since a data center and electric utility uses would be allowed under these land use designations.

The CABGF/CADC would have a floor area ratio of 0.9, which would not exceed the maximum IP floor area ratio of 10.0. The proposed three-story data center building would not exceed the IP designation's allowable 15 stories or the maximum height of 120 feet allowed in the IP zoning district.

The Project's consistency with applicable General Plan policies and Municipal Code requirements pertaining to specific environmental impacts are discussed throughout this SPPE Application in the relevant resource areas. For these reasons, the proposed Project would not result in environmental impacts due to conflict with the General Plan or Zoning Code or any other land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact)**

Compatibility with Airport Operations

The Project is not located within the AIA for any airport; therefore, the Project would not conflict with a CLUP.[145,146] **(No Impact)**

Santa Clara Valley Habitat Plan

As discussed under checklist question f) in Section 4.4 Biological Resources, the CABGF/CADC and Trimble Substation Expansion Site, and off-site multi-modal improvements are considered a covered activity under the Santa Clara Valley Habitat Plan, and with implementation of PDM BIO-4 (i.e., conformance with applicable Habitat Plan conditions and fees), the Project would not conflict with provisions of the Habitat Plan. Additionally, the overhead transmission towers and PG&E transmission lines are covered under the PG&E Bay Area HCP. With implementation of programmatic measures and BMPs identified in the HCP, as required by the CPUC, the project would not conflict with the provisions of the HCP. **(Less than Significant Impact)**

4.11.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant land use and planning impact?

The proposed Project would not include any infrastructure that could potentially divide an established community, such as roadways, bridges, or open spaces. Development of the Project would be confined to the site and would be consistent with the City's General Plan and Zoning Ordinance. The Project would not conflict with any other land use plans, policies, or regulations adopted to reduce or avoid environmental impacts. Other projects in the city would be required to go through the City's development review process. Projects would be analyzed for conformance with applicable policies adopted for the purpose of avoiding or mitigating an environmental impact through the CEQA review process. The Project, in combination with other cumulative development, would not result in a significant cumulative land use impact. **(Less than Significant Cumulative Impact)**

[145] Santa Clara County Airport Land Use Commission. *Comprehensive Land Use Plan Santa Clara County Norman Y. Mineta San José International Airport*. March 27, 2024. Figure 8.
[146] Santa Clara County Airport Land Use Commission. *Comprehensive Land Use Plan Santa Clara County Reid-Hillview Airport*. November 18, 2020. Figure 8.

4.12 Mineral Resources

4.12.1 Environmental Setting

4.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

Pursuant to the mandate of the SMARA, the SMGB has designated the Communications Hill Area (Sector EE), bounded generally by the Southern Pacific Railroad, Curtner Avenue, SR 87, and Hillsdale Avenue as containing mineral deposits that are of regional significance as a source of construction aggregate materials. Neither the State Geologist nor the SMGB have classified any other areas in San José as containing mineral deposits of statewide significance or requiring further evaluation.

4.12.1.2 *Existing Conditions*

The Santa Clara Valley was formed when sediments derived from the Santa Cruz Mountains and the Mount Hamilton-Diablo Range were exposed by continuous tectonic uplift and regression of the inland sea that had previously inundated the area. As a result of this process, the topography of the City is relatively flat and there are no significant mineral resources.

Pursuant to the mandate of the SMARA, the SMGB has designated the Communications Hill Area (Sector EE), bounded generally by the Southern Pacific Railroad, Curtner Avenue, SR 87, and Hillsdale Avenue as containing mineral deposits that are of regional significance as a source of construction aggregate materials.[147] Neither the State Geologist nor the SMGB have classified any other areas in San José as containing mineral deposits of statewide significance or requiring further evaluation. The Project Component Sites are located approximately 7.6 miles northwest of Communications Hill.

[147] City of San José. *Envision San José 2040 General Plan*. Adopted November 1, 2011. As Amended on May 7, 2025. Page 36, Chapter 3 Environmental Leadership.

4.12.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
Would the project result in a cumulatively considerable contribution to a cumulatively significant mineral resources impact?	☐	☐	☐	☒

4.12.2.1 *Project Impacts*

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?

As discussed in Section 4.12.1.2 Existing Conditions, none of the Project Component Sites are located in an area containing any known mineral resources. Implementation of the Project would not result in the loss of availability of any known resources. **(No Impact)**

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

As stated in Section 4.12.1.2 Existing Conditions, the only identified mineral resources in San José are located within the Communications Hill area. The Project Component Sites are approximately 7.6 miles northwest of Communications Hill. Therefore, the proposed Project would not result in the loss of availability of a locally important mineral resource. **(No Impact)**

4.12.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant mineral resources impact?

As discussed above, the Project Component Sites would not result in the loss of a known mineral resource or mineral resource recovery site. Therefore, the Project in combination with other projects would not contribute to a significant cumulative mineral resource impact. **(No Cumulative Impact)**

4.13 Noise

The following discussion is based on Noise and Vibration Assessments prepared by Illingworth & Rodkin, Inc. for the CABGF/CADC Site (October 2026) and the Trimble Substation Expansion Site and PG&E transmission lines (August 2026). Copies of these reports are included as Appendix L of this SPPE Application. The Noise and Vibration Assessments recommend mitigation measures to reduce impacts. The Applicant has incorporated these recommendations into PDMs as discussed below.

4.13.1 Environmental Setting

4.13.1.1 *Background Information*

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, DNL, or CNEL.[148] These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

[148] L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq}.

4.13.1.2 *Regulatory Framework*

State and Local

California Building Standards Code

The California Building Code establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources do not exceed 45 L_{dn}/CNEL in any habitable room. Exterior windows must have a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA DNL noise contour for a freeway or expressway, railroad, or industrial source.

Comprehensive Land Use Plan for San José Mineta International Airport

The CLUP for San José Mineta International Airport, adopted by the Santa Clara County Airport Land Use Commission on March 27, 2024, is intended to safeguard the general welfare of the inhabitants within the vicinity of the airport and the aircraft occupants. The CLUP is also intended to ensure that surrounding new land uses do not affect the airport's continued operation.

Envision San José 2040 General Plan

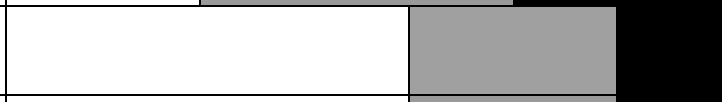
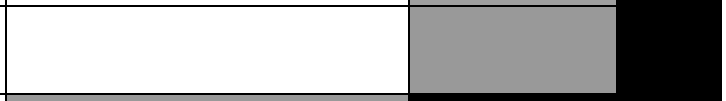
The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from planned development projects with the City. The following policies are specific to noise and vibration and are applicable to the proposed Project.

Policies	Description
EC-1.1	Locate new development in areas where noise levels are appropriate for the proposed uses. Consider federal, State and City noise standards and guidelines as a part of new development review. Applicable standards and guidelines for land uses in San José include: Interior Noise Levels • The City's standard for interior noise levels in residences, hotels, motels, residential care facilities, and hospitals is 45 dBA DNL. Include appropriate site and building design, building construction and noise attenuation techniques in new development to meet this standard. For sites with exterior noise levels of 60 dBA DNL or more, an acoustical analysis following protocols in the City-adopted California Building Code is required to demonstrate that development projects can meet this standard. The acoustical analysis shall base required noise attenuation techniques on expected *Envision General Plan* traffic volumes to ensure land use compatibility and General Plan consistency over the life of this plan. Exterior Noise Levels The City's acceptable exterior noise level objective is 60 dBA DNL or less for residential and most institutional land uses [refer to Table EC-1 in the General Plan or

Policies	Description
	Table 4.13-1 in this SPPE]. The acceptable exterior noise level objective is established for the City, except in the environs of the San José International Airport and the Downtown, as described below: - For new multi-family residential projects and for the residential component of mixed-use development, use a standard of 60 dBA DNL in usable outdoor activity areas, excluding balconies and residential stoops and porches facing existing roadways. Some common use areas that meet the 60 dBA DNL exterior standard will be available to all residents. Use noise attenuation techniques such as shielding by buildings and structures for outdoor common use areas. On sites subject to aircraft overflights or adjacent to elevated roadways, use noise attenuation techniques to achieve the 60 dBA DNL standard for noise from sources other than aircraft and elevated roadway segments. - For single family residential uses, use a standard of 60 dBA DNL for exterior noise in private usable outdoor activity areas, such as backyards
EC-1.2	Minimize the noise impacts of new development on land uses sensitive to increased noise levels [Land Use Categories 1, 2, 3 and 6 in Table EC-1 in the General Plan or Table 4.13-1 in this SPPE] by limiting noise generation and by requiring use of noise attenuation measures such as acoustical enclosures and sound barriers, where feasible. The City considers significant noise impacts to occur if a project would: • Cause the DNL at noise sensitive receptors to increase by 5 dBA DNL or more where the noise levels would remain "Normally Acceptable"; or • Cause the DNL at noise sensitive receptors to increase by 3 dBA DNL or more where noise levels would equal or exceed the "Normally Acceptable" level.
EC-1.7	Require construction operations within San José to use best available noise suppression devices and techniques and limit construction hours near residential uses per the City's Municipal Code. The City considers significant construction noise impacts to occur if a project located within 500 feet of residential uses or 200 feet of commercial or office uses would: • Involve substantial noise generating activities (such as building demolition, grading, excavation, pile driving, use of impact equipment, or building framing) continuing for more than 12 months. For such large or complex projects, a construction noise logistics plan that specifies hours of construction, noise and vibration minimization measures, posting or notification of construction schedules, and designation of a noise disturbance coordinator who would respond to neighborhood complaints will be required to be in place prior to the start of construction and implemented during construction to reduce noise impacts on neighboring residents and other uses.
EC-2.3	Require new development to minimize continuous vibration impacts to adjacent uses during demolition and construction. For sensitive historic structures, including ruins and ancient monuments or building that are documented to be structurally weakened, a continuous vibration limit of 0.08 in/sec PPV (peak particle velocity) will be used to minimize the potential for cosmetic damage to a building. A continuous vibration limit of 0.20 in/sec PPV will be used to minimize the potential for cosmetic damage at buildings of normal conventional construction. Equipment or activities typical of generating continuous vibration include but are not limited to: excavation equipment; static compaction equipment; vibratory pile drivers; pile-extraction equipment; and vibratory compaction equipment. Avoid use of impact pile drivers within 125 feet of any

Policies	Description
	buildings, and within 300 feet of historical buildings, or buildings in poor condition. On a project-specific basis, this distance of 300 feet may be reduced where warranted by a technical study by a qualified professional that verifies that there will be virtually no risk of cosmetic damage to sensitive buildings from the new development during demolition and construction. Transient vibration impacts may exceed a vibration limit of 0.08 in/sec PPV only when and where warranted by a technical study by a qualified professional that verifies that there will be virtually no risk of cosmetic damage to sensitive buildings from the new development during demolition and construction.

Table 4.13-1: General Plan Noise Land Use Compatibility Guidelines

Land Use Category	Exterior DNL Value in Decibels 55 60 65 70 75 80
1. Residential, Hotels and Motels, Hospitals and Residential Care[1]	
2. Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds	
3. Schools, Libraries, Museums, Meeting Halls, and Churches	
4. Office Buildings, Business Commercial, and Professional Offices	
5. Sports Arena, Outdoor Spectator Sports	
6. Public and Quasi-Public Auditoriums, Concert Halls, and Amphitheaters	

Notes: [1]Noise mitigation to reduce interior noise levels pursuant to Policy EC-1.1 is required.

Normally Acceptable:
Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable:
Specified land use may be permitted only after detailed analysis of the noise reduction requirements and noise mitigation features included in the design.

Unacceptable:
New construction or development should generally not be undertaken because mitigation is usually not feasible to comply with noise element policies.

4.13.1.3 *Existing Conditions*

Existing Noise Environment

The noise environment at the Project Component Sites is generated primarily from traffic noise along Zanker Road, Charcot Avenue, N. First Street, and E. Brokaw Road, with some small contribution from vehicles on Interstate 880 (I-880). Surrounding light industrial and office uses and aircraft noise from San José Mineta International Airport also contribute to the existing noise environment. A railroad spur is located along the northeastern property line of the CABGF/CADC Site; however, available information suggests it is infrequently used.

Existing Ambient Noise Levels

A noise monitoring survey consisting of three long-term (LT-1 through LT-3) and three short-term (ST-1 through ST-3) noise measurements was conducted at sensitive receptor locations in the vicinity of the Site between Thursday, April 2, 2026, and Tuesday, April 7, 2026. All measurement locations are shown in Figure 4.13-1. Table 4.13-2 lists the short-term noise measurements.

Table 4.13-2: Short-Term Noise Measurements

Noise Measurement Location	Date, Time	L_{max}	$L_{(1)}$	$L_{(10)}$	$L_{(50)}$	$L_{(90)}$	L_{eq}
ST-1: 55 feet from the Bering Drive centerline	4/2/2026, 14:30-14:40	70	68	62	56	52	59
ST-2: 125 feet from the Charcot Avenue centerline	4/2/2026, 14:50-15:00	70	68	62	56	52	59
ST-3: 80 feet from the E. Brokaw Road centerline	4/2/2026, 15:10-15:20	82	75	70	65	59	67

ST = short-term; L_{max} = maximum A-weighted noise level during the measurement period; $L_{(1)}$, $L_{(10)}$, $L_{(50)}$, $L_{(90)}$ = The A-weighted noise levels that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period; L_{eq} = The average A-weighted noise level during the measurement period.

Illingworth & Rodkin. *Charcot Avenue Data Center Project Noise and Vibration Assessment*. October 2026.

Long-term noise measurement LT-1 was made in front of the office building at 2085 Zanker Road, approximately 85 feet from the centerline. Hourly average noise levels at LT-1 typically ranged from 58 to 67 dBA L_{eq} during daytime hours (7:00 AM and 10:00 PM) and from 52 to 63 dBA L_{eq} during nighttime hours (10:00 PM and 7:00 AM) on weekdays. On weekends, hourly average noise levels typically ranged from 57 to 63 dBA L_{eq} during daytime hours and from 53 to 60 dBA L_{eq} during nighttime hours. The day-night average noise level ranged from 65 to 66 dBA DNL on weekdays and from 62 to 64 dBA DNL over the weekend.

NOISE MEASUREMENTS LOCATIONS | FIGURE 4.13-1

LT-2 was made outside of 2250 Zanker Road, approximately 60 feet from the centerline of Charcot Avenue. Hourly average noise levels at LT-2 typically ranged from 56 to 66 dBA L_{eq} during daytime hours and from 48 to 65 dBA L_{eq} during nighttime hours on weekdays. On weekends, hourly average noise levels typically ranged from 55 to 61 dBA L_{eq} during daytime hours and from 50 to 60 dBA L_{eq} during nighttime hours. The day-night average noise level ranged from 65 to 66 dBA DNL on weekdays and from 61 to 63 dBA DNL on the weekend.

LT-3 was made in the rear parking lot of the Hampton Inn & Suites San José Airport. Hourly average noise levels at LT-3 typically ranged from 52 to 57 dBA L_{eq} during daytime hours and from 44 to 56 dBA L_{eq} during nighttime hours on weekdays. On weekends, hourly average noise levels typically ranged from 49 to 56 dBA L_{eq} during daytime and nighttime hours. The day-night average noise level ranged from 57 to 59 dBA DNL on weekdays and from 59 to 60 dBA DNL on the weekend.

Existing Noise-Sensitive Receptors

The nearest noise sensitive receptors to the CABGF/CADC Site are hotels located approximately 0.4 mile to the southwest. The nearest noise sensitive receptor to the Trimble Substation Expansion Site is a hotel located approximately 1,000 feet to the northwest. Of the proposed PG&E transmission line routes, only Route 2 and 3 pass by a noise sensitive receptors (i.e., university building and hotel). There are also commercial, office, and industrial buildings within 100 feet of the Project Component Sites. There are no sensitive historical structures located within 200 feet of the Project Component Sites.[149]

4.13.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

[149] City of San José. "Historic Resources Inventory." Accessed May 27, 2026. https://experience.arcgis.com/experience/4ef3418d9e58451c9c45086ac9a90d6e.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
Would the project result in a cumulatively considerable contribution to a cumulatively significant noise impact?	☐	☐	☒	☐

City of San José Standards

The City of San José relies on the following guidelines and standards for new development to avoid impacts above the CEQA thresholds of significance outlined above.

Construction Noise

The City considers significant construction noise impacts to occur if a project that is located within 500 feet of residential uses or 200 feet of commercial or office uses would involve substantial noise-generating activities (such as building demolition, grading, excavation, pile driving, use of impact equipment, or building framing) continuing for more than 12 months. While the City of San José does not establish noise level thresholds for construction activities, this analysis uses the noise limits established by the Federal Transit Administration (FTA) to quantify potential impacts due to substantial temporary construction noise for informational purposes. The FTA identifies construction noise limits in the Transit Noise and Vibration Impact Assessment Manual. During daytime hours, an exterior threshold of 80 dBA L_{eq} shall be enforced at residential land uses, 85 dBA L_{eq} shall be enforced at commercial land uses, and 90 dBA L_{eq} shall be enforced at industrial land uses.

Operational Noise

The City of San José considers a significant noise impact to occur where existing noise sensitive land uses would be subject to permanent noise level increases of 3.0 dBA DNL or more where noise levels would equal or exceed the “Normally Acceptable” level, or 5.0 dBA DNL or more where noise levels would remain normally acceptable. A significant noise impact would also be identified if the project would expose persons to or generate noise levels that would exceed applicable noise standards presented in the General Plan.

Construction Vibration

The City of San José relies on guidance developed by Caltrans to address vibration impacts from development projects in San José. A vibration limit of 12.7 millimeters per second (mm/sec; 0.5 inch/sec) PPV is used for buildings that are structurally sound and designed to modern engineering standards. A conservative vibration limit of 5.0 mm/sec (0.2 inches/sec) PPV has been used for buildings that are found to be structurally sound but where structural damage is a major concern. For historic buildings or buildings that are documented to be structurally weakened, a conservative limit of 2.0 mm/sec (0.08 inches/sec) PPV is used to provide the highest level of protection.

4.13.2.1 *Project Impacts*

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Noise

Policy EC-1.7 of the City's General Plan requires that all construction activities within the City use best available noise suppression devices and techniques and to limit construction hours near residential uses per the Municipal Code, which are between 7:00 AM and 7:00 PM on weekdays when construction occurs within 500 feet of a residential land use. Furthermore, the City considers a significant construction noise impact to occur if a project is located within 500 feet of a residential use or 200 feet of a commercial or office use and would involve substantial noise-generating activities continuing for a period of more than 12 months. As noted in Existing Conditions above, there are no residential uses within 500 feet of the Project Components Sites but there are commercial and office uses within 200 feet of them.

While the City of San José does not establish noise level thresholds for construction activities, this analysis uses the noise limits established by the Federal Transit Administration (FTA) to identify the potential for impacts due to substantial temporary construction noise. The FTA identifies construction noise limits in the *Transit Noise and Vibration Impact Assessment Manual*.[1] During daytime hours, an exterior threshold of 80 dBA L_{eq} shall be applied at residential land uses, 85 dBA L_{eq} shall be applied at commercial land uses, and 90 dBA L_{eq} shall be applied at industrial land uses. Table 4.13-3 through Table 4.13-5 lists the noise level estimates at nearby land uses and receptors in proximity to the Project Component Sites. The noise levels do not assume reductions due to intervening buildings or existing barriers.

Table 4.13-3: Estimated CABGF/CADC Construction Noise Levels at Nearby Land Uses – 10/16 Hour Workday (dBA L_{eq})

Phase of Construction	East Light Industrial	South Light Industrial	West Light Industrial	North Light Industrial	Nvidia University	Southwest Hotels
Distance from Property Line (Feet)	345	465	560	520	930	2,025
Demolition	75	73	71	72	66	60
Site Cleanup/Preparation	71	69	67	68	63	56
Grading/ Trenching/Foundation	76	73	71	72	67	60
Building Construction (Exterior and Interior)	71	68	66	67	62	55
Paving Sitework	70	68	66	67	62	55
Architectural Coating	62	60	58	59	53	47

L_{eq} = The average A-weighted noise level during the measurement period.

Note: Construction noise levels for the 10-hour and 16-hour workdays at nearby land uses were identical, as construction equipment used does not differ between the two scenarios.

Illingworth & Rodkin. *Charcot Avenue Data Center Project Noise and Vibration Assessment*. October 2026. Tables 9 and 10.

Table 4.13-4: Estimated Trimble Substation Expansion Construction Noise Levels at Nearby Land Uses (dBA L_{eq})

Phase of Construction	North Offices	East Gov. Off., TV Station & Probation Facility	South Offices	West Offices & Manufacturing
Distance from Property Line (Feet)	410	530	445	1,355
Site Preparation	64	61	63	53
Grading/ Excavation/ Trenching/ Foundation (115 kV GIS)	70	68	70	60
Building/Facility Construction (115 kV GIS)	72	70	72	62
Architectural Coating (115 kV GIS)	56	54	56	46
Grading/ Excavation/ Trenching/ Foundation (230 kV GIS)	70	68	70	60

Phase of Construction	North Offices	East Gov. Off., TV Station & Probation Facility	South Offices	West Offices & Manufacturing
Building/Facility Construction (230 kV GIS)	72	70	72	62
Architectural Coating (230 kV GIS)	56	54	56	46
Paving	68	66	68	58

L_{eq} = The average A-weighted noise level during the measurement period.

Illingworth & Rodkin. *Brokaw Road Data Center – Switching Station & Transmission Line Installation Noise And Vibration Assessment*. August 2026. Table 7.

Table 4.13-5: Estimated PG&E Transmission Line Construction Noise Levels at Nearby Receptors (dBA L_{eq})

Phase of Construction	Route 1	Route 2	Route 3
Distance to Receptors (Feet)	50 to 160	50 to 290	45 to 290
Site Preparation (Marking & Vegetation Management)	77 to 78	72 to 78	72 to 79
Vault Installation	76 to 82	71 to 82	71 to 83
Trenching & Duct Banks	82 to 83	76 to 83	76 to 84
Trenchless Installation	78 to 84	73 to 84	73 to 85
Cable Installation, Splicing & Testing	77 to 79	72 to 79	72 to 80
Truck Drivers	74 to 76	69 to 76	69 to 76
Inspectors	64 to 71	59 to 71	59 to 72
Repaving	78 to 82	73 to 82	73 to 83

L_{eq} = The average A-weighted noise level during the measurement period.

Illingworth & Rodkin. *Brokaw Road Data Center – Switching Station & Transmission Line Installation Noise And Vibration Assessment*. August 2026. Table 9.

As shown in Table 4.13-3 and Table 4.13-4, construction noise levels, when focused near the center of the CABGF/CADC and Trimble Substation Expansion Sites, would be below 80 dBA L_{eq} at the nearest light industrial uses and below 70 dBA L_{eq} at the nearest noise-sensitive uses (i.e., Nvidia University and hotels). Therefore, noise generated from the construction of the CABGF/CADC and Trimble Substation Expansion would not exceed the FTA thresholds. Although the CABGF/CADC and Trimble Substation Expansion Sites are not located within 500 feet of existing residential uses, they are located within 200 feet of existing non-residential uses. Additionally, the total construction is expected to last for a period of more than 12 months. As shown in Table 4.13-5, construction of the PG&E transmission lines would result in noise levels exceeding the FTA threshold of 80 dBA L_{eq} at sensitive receptors (i.e., Nvidia University, hotels) along Route 1 and Route 3. Excessive construction noise during the installation of the transmission line, however, would be limited at any one receptor

to a maximum time period of less than three months because construction would be transient and move away from the receptor. Based on the above discussion, the City's Standard Permit Conditions for Noise are incorporated into the Project as a PDM to reduce construction noise levels associated with the CABGF/CADC and Trimble Substation Expansion to less than significant.

PDM NOI-1: **Construction Noise Best Management Practices**. The Project shall implement the following City of San José Standard Permit Conditions related to construction noise:

- Construct solid plywood fences or similar noise reducing mechanism around ground level construction sites adjacent to operational business, residences, or other noise-sensitive land uses.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Prohibit unnecessary idling of internal combustion engines.
- Locate stationary noise-generating equipment such as air compressors or portable power generators as far as possible from sensitive receptors (if any). Construct temporary noise barriers to scree stationary noise-generating equipment when located near adjoining sensitive land uses (if any).
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Control noise from construction workers' radios to a point where they are not audible at existing residences.
- Prior to the start of construction, notify all directly adjacent business, residences, and other noise-sensitive land uses of the construction schedule, in writing, and provide a written schedule of "noisy" construction activities to directly adjacent land uses and nearby residences (within 500 feet).
- If complaints are received and determined by the City to be valid and excessive noise levels cannot be reduced using the measures above, erect additional temporary noise control measures along surrounding building facades that face the construction sites to the extent feasible.
- Designate a "disturbance coordinator" who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the

construction site and include it in the notice sent to neighbors regarding the construction schedule.

With implementation of the PDM NOI-1, the Project would have a less than significant construction noise impact. **(Less than Significant Impact)**

Operational Noise

The PG&E transmission lines would not generate any noticeable operational noise; thus, they are not discussed in this section.

According to Policy EC-1.2 of the City's General Plan, a significant permanent noise increase would occur if the project substantially increased noise levels at existing sensitive receptors in the project vicinity. A substantial increase would occur if: (a) the noise level increase is 5 dBA DNL or greater, with a future noise level of less than 60 dBA DNL at residences; or (b) the noise level increase is 3 dBA DNL or greater, with a future noise level of 60 dBA DNL or greater at residences. Noise levels around the project site exceed 60 dBA DNL; therefore, a significant impact would occur if traffic or operational noise from the proposed project permanently increases ambient levels by 3 dBA DNL.

General Plan Policy EC-1.3 requires new nonresidential land uses located adjacent to existing or planned noise-sensitive residential or public/quasi-public land uses to mitigate operational noise such that noise levels do not exceed 55 dBA DNL at the property line. Although the hotels to the southwest are not directly adjacent to the project site, these receptors were evaluated in accordance with the policy's intent to protect nearby noise-sensitive uses from excessive operational noise.

Section 20.50.300 of the City's Municipal Code establishes noise level performance standards for sources of noise originating from land zoned for industrial use. Noise levels are not to exceed 55 dBA at receiving residential uses, 60 dBA at receiving office and commercial uses, and 70 dBA at receiving industrial uses.

CABGF/CADC

Potential sources of operational noise from the CABGF/CADC would be Project traffic, truck loading and unloading activity, and data center and substation operation.

Project-Generated Traffic

The proposed data center project would generate 351 daily trips. The existing average daily traffic volumes along Charcot Avenue and Zanker Road are approximately 10,217 and 8,670 average daily trips, respectively.[150] Adding 351 daily trips from the proposed project would not result in a

[150] City of San José. "Average Daily Traffic." February 10, 2026. Accessed May 27, 2026. https://gisdata-csj.opendata.arcgis.com/datasets/CSJ::average-daily-traffic/explore?location=37.382329%2C-121.923746%2C15.

measurable or detectable increase in noise levels in the area (zero dBA DNL increase). **(Less than Significant Impact)**

Truck Loading and Unloading Activity

The data center loading area would be along the northwestern façade of the building. Noise generated by truck loading and unloading activities at the data center would be well shielded from the existing receptors to the south and east.

Truck maneuvering noise would include a combination of engine, exhaust, and tire noise, as well as intermittent sounds of backup alarms and the release of compressed air associated with truck/trailer air brakes. The noise level of backup alarms can vary depending on the type and directivity of the sound, but maximum levels are typically 65 to 75 dBA at 50 feet. Heavy-duty trucks are expected at the data center, generating noise levels of 70 to 75 dBA at 50 feet, with back alarms reaching 75 dBA at 50 feet. Assuming five to eight deliveries would occur in a day, the hourly average noise levels would range 71 to 73 dBA L_{eq} at 50 feet.

The property line of the closest north industrial land uses across Charcot Avenue would be approximately 135 feet from the center of the loading zone. Assuming no attenuation, the hourly average noise levels would range from 62 to 64 dBA L_{eq} at the industrial-use property line. The day-night average noise level at the closest receptor property line would range from 48 to 50 dBA DNL, assuming five to eight truck deliveries per day occurring between 7:00 AM and 10:00 PM. Since the ambient existing noise level at this location ranged from 61 to 66 dBA DNL, noise from truck loading/unloading would not result in a measurable increase (zero dBA DNL). Noise impacts at receptors at other industrial and commercial uses further away (over 200 feet away from the center of the loading zone) would be even lower. Therefore, the truck loading and unloading activity would not have an operational noise impact. **(Less than Significant Impact)**

Data Center and Substation Operation

Mechanical equipment at the data center buildings would include 42 three-MW diesel-powered backup generators, two 1.5-MW diesel-powered backup generators, 42 rooftop air-cooled chillers, along with dedicated outside air systems (DOAS) and exhaust fans. The backup generators for emergency power supply would be located in a generator yard on the west side of the CADC building. Manufacturer specifications in terms of source levels for the mechanical equipment were provided by the applicant and are summarized in Appendix L.

The CABGF/CADC Project will also include a new 100 MVA electrical substation west of the generator yard. The two-bay substation (two 100 MVA 117 kV-34.5kV step-down transformers and primary distribution switchgear) will be designed to allow one of the two transformers to be taken out of service, effectively providing 100 MVA of total power (a 2-to-make-1 design). This substation would include various components such as transformers, gas-insulated circuit breakers, and switchgear. In the absence of manufacturer-specific acoustic data, transformer noise was represented using typical sound levels published by the National Electrical Manufacturers

Association. According to National Electrical Manufacturers Association Standard Publication TR-1 , large liquid-filled power transformers with approximately 100 MVA capacity typically produce sound levels in the range of 68 to 71 dBA at a distance of 6.5 feet (two meters) when operating under forced-air cooling. For the purposes of this assessment, a conservative sound level of 71 dBA at 6.5 feet was assumed to represent each transformer. Other substation equipment, such as gas-insulated circuit breakers and switchgear, may generate brief, impulsive sounds during switching operations, but these events occur infrequently and are not expected to meaningfully contribute to the steady-state operational noise environment; therefore, they were not modeled as continuous noise sources in this assessment.

To calculate the CADC and Project Substation noise levels, SoundPLAN (version 9.0), a three-dimensional ray-tracing computer program, was used to create scenarios representing daily operations with and without the emergency generators. The mechanical equipment noise sources were modeled as either point-sources (e.g., generators, rooftop DOAS units, etc.) or area sources (e.g., rooftop air-cooled chillers) to demonstrate the noise propagation to the nearby receptors based on the cumulative noise from the combined sources operating during the different scenarios. To model the worst-case scenario, no attenuation was assumed from the rooftop equipment and the generator yard. All pieces of mechanical equipment were assumed to operate continuously throughout the day, with the exception of the generators. Generator operations were modeled assuming a maximum of eight hours of testing on one day, with one hour of testing per generator at 100 percent load. All generators would be tested sequentially (one after the other) not simultaneously.

Figure 4.13-2 and Figure 4.13-4 show the hourly average L_{eq} noise levels without and with emergency generators, respectively. Figure 4.13-3 and Figure 4.13-5 show the DNL noise levels without and with emergency generators, respectively.

Table 4.13-6 and Table 4.13-7 summarize the noise levels calculated in SoundPLAN for the surrounding off-site receptors during daily operations without and with the emergency generators, respectively. The tables show the maximum noise levels and the DNL noise levels calculated at the nearest receiving property lines from the mechanical equipment.

Table 4.13-6: Daily Operational Noise Levels without Emergency Generator Testing

Receptor	Max Hourly L_{eq} (dBA)	Max DNL (dBA)
North Industrial	60	66
East Industrial	62	68
West Industrial	61	67
South Industrial	60	66
Southwest Hotels	54	**60**

Bold text indicates a significant impact

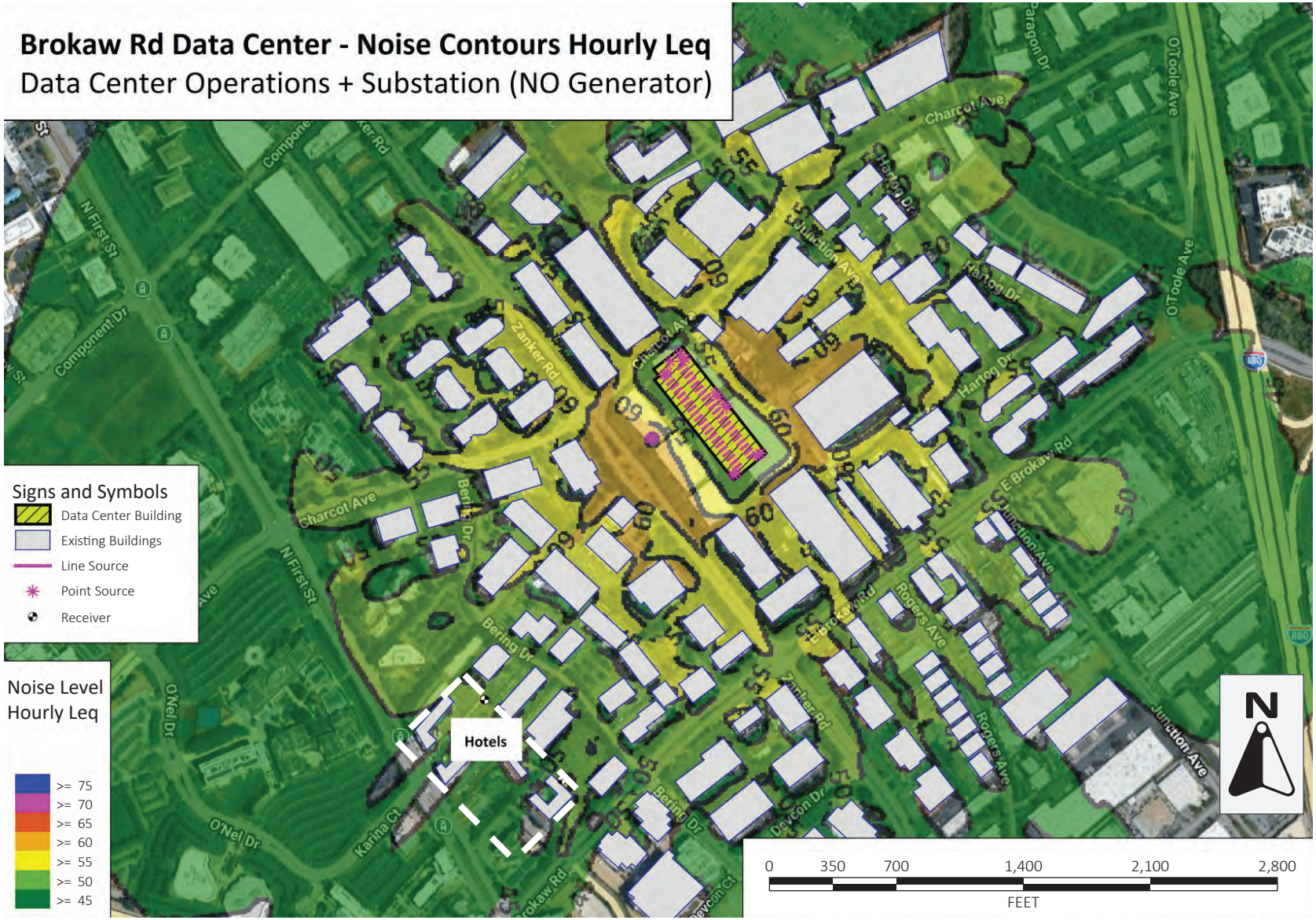
Illingworth & Rodkin. *Charcot Avenue Data Center Project Noise and Vibration Assessment*. October 2026. Table 11.

Table 4.13-7: Daily Operational Noise Levels with Emergency Generator Testing

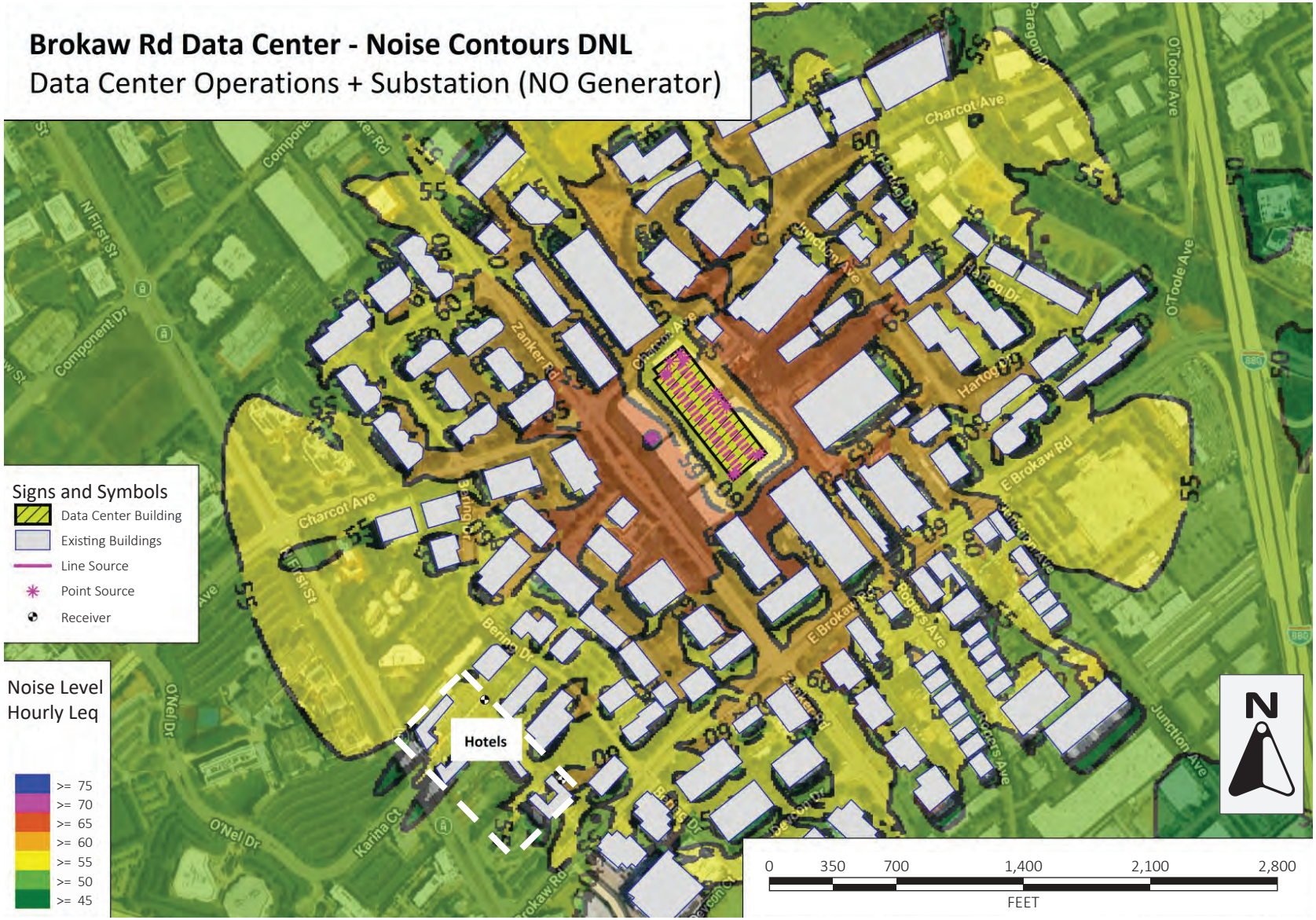
Receptor	Max Hourly L_{eq} (dBA)	Max DNL (dBA)
North Industrial	69	66
East Industrial	62	68
West Industrial	65	68
South Industrial	68	66
Southwest Hotels	55	**60**

Bold text indicates a significant impact

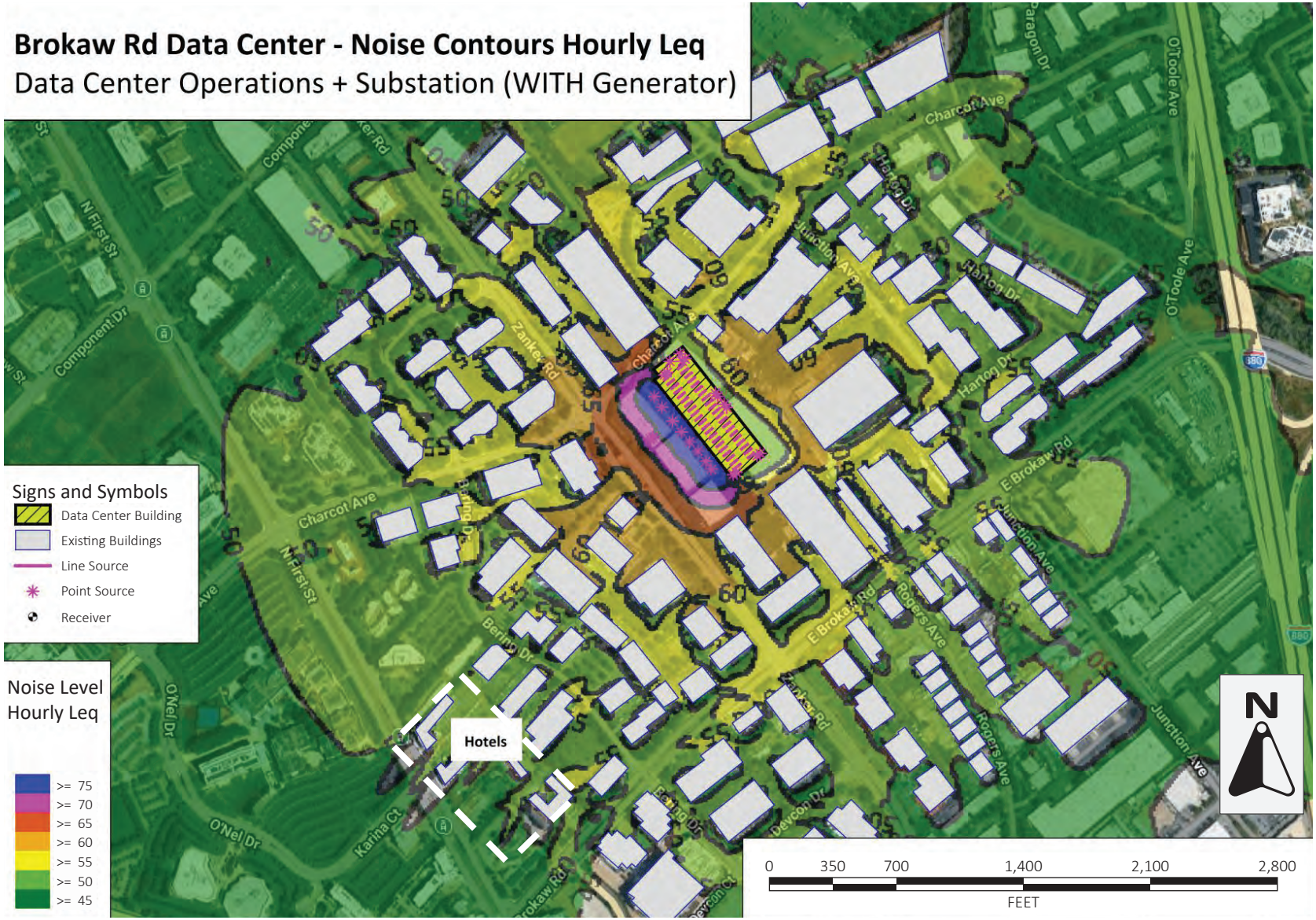
Illingworth & Rodkin. *Charcot Avenue Data Center Project Noise and Vibration Assessment*. October 2026. Table 12.



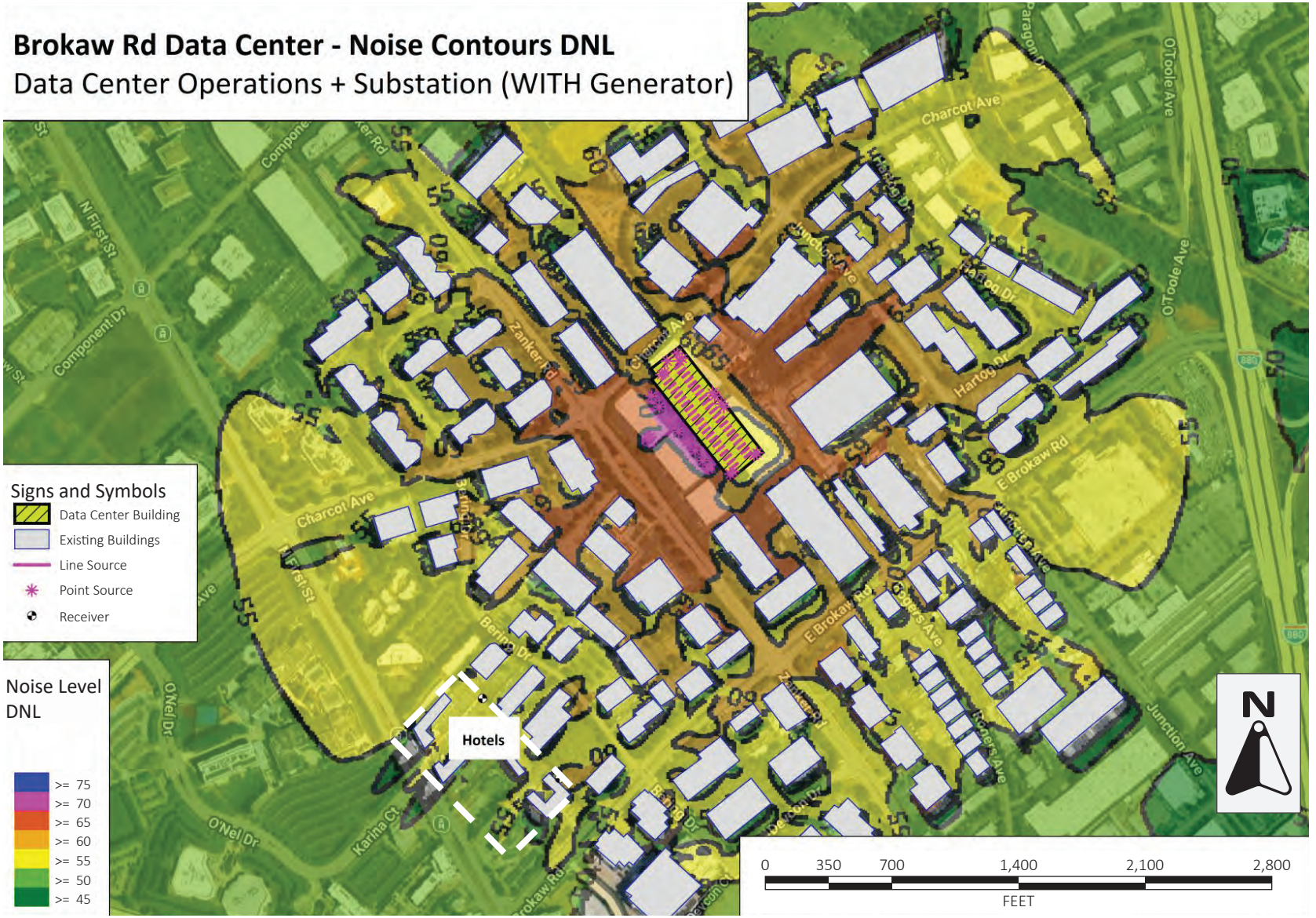
HOURLY AVERAGE NOISE CONTOURS (L_{eq}) FOR DATA CENTER OPERATION WITHOUT EMERGENCY GENERATOR TESTING | FIGURE 4.13-2



NOISE CONTOURS (DNL) FOR DATA CENTER OPERATION WITHOUT EMERGENCY GENERATOR TESTING | FIGURE 4.13-3



HOURLY AVERAGE NOISE CONTOURS (L_{eq}) FOR DATA CENTER OPERATION WITH EMERGENCY GENERATOR TESTING | FIGURE 4.13-4



NOISE CONTOURS (DNL) FOR DATA CENTER OPERATION WITH EMERGENCY GENERATOR TESTING | FIGURE 4.13-5

As shown in Table 4.13-6 and Table 4.13-7 above, data center and substation operation hourly average noise levels (L_{eq}) would not exceed the City's Municipal Code threshold of 70 dBA at receiving industrial uses with or without the emergency generator testing. However, the DNL noise levels at the hotels[151] to the southwest of the CABGF/CADC Site would exceed the City's General Plan Policy EC-1.3 noise level threshold of 55 dBA DNL for noise sensitive land uses. The primary source for the noise impact would be the rooftop chiller equipment. The exceedance of the City's General Plan Policy EC-1.3 threshold of 55 dBA DNL would be reduced to less than significant levels with the implementation of PDM NOI-2.

PDM NOI-2: **Noise Attenuation for Mechanical Equipment**. The Project Applicant shall include noise reduction measures to reduce operational noise levels to meet the City of San José's General Plan Policy EC-1.3 threshold of 55 dBA DNL at the nearest sensitive receptor (i.e., the hotels southwest of the CADC site). Compliance with the 55 dBA DNL threshold shall be achieved through installation of chillers with a maximum sound power level of 99 dBA, in which case no screen wall would be required. Alternatively, the project shall include of a rooftop screen wall and installation of chillers with adequate sound power levels which, in combination with the rooftop screen wall, would achieve the required noise reduction. The rooftop screen shall fully enclose the chillers on all sides. The screen wall shall be constructed with no acoustically significant gaps and shall provide a minimum surface density of three pounds per square foot or greater. A louvered screen wall with acoustical treatments meeting a minimum insertion loss of five dBA and a minimum transmission loss of 15 dB or greater may be used in lieu of a solid screen wall. The following combinations of screen wall height and chiller sound power levels would reduce operational noise below the 55 dBA DNL threshold at the nearest sensitive receptors.

Screen Wall Height (feet)	Chiller Sound Power (dBA)
10	100
12	101
16	102
20	103
24	104

Once the screen wall height and chiller selection are finalized, a qualified acoustic/noise specialist shall prepare an acoustical analysis to demonstrate that the chosen measures would reduce the noise levels at the surrounding noise-sensitive land uses (i.e., southwest hotels) to a level below 55 dBA DNL. The

[151] Hotels are considered a noise-sensitive land use because they contain overnight occupants and sleeping areas. Although the hotel site is designated Commercial General under the City of San José General Plan 2040 land use designation, a conservative residential noise standard is applied to evaluate potential impacts

Project Applicant shall submit the prepared acoustical analysis and an engineering-approved site plan showing the noise control measures to the City of San José's Director of Planning, Building and Code Enforcement or the Director's designee for their review and approval prior to the issuance of building permits.

With implementation of the PDM NOI-2, the CABGF/CADC would not result in a significant operational noise impact. **(Less than Significant Impact)**

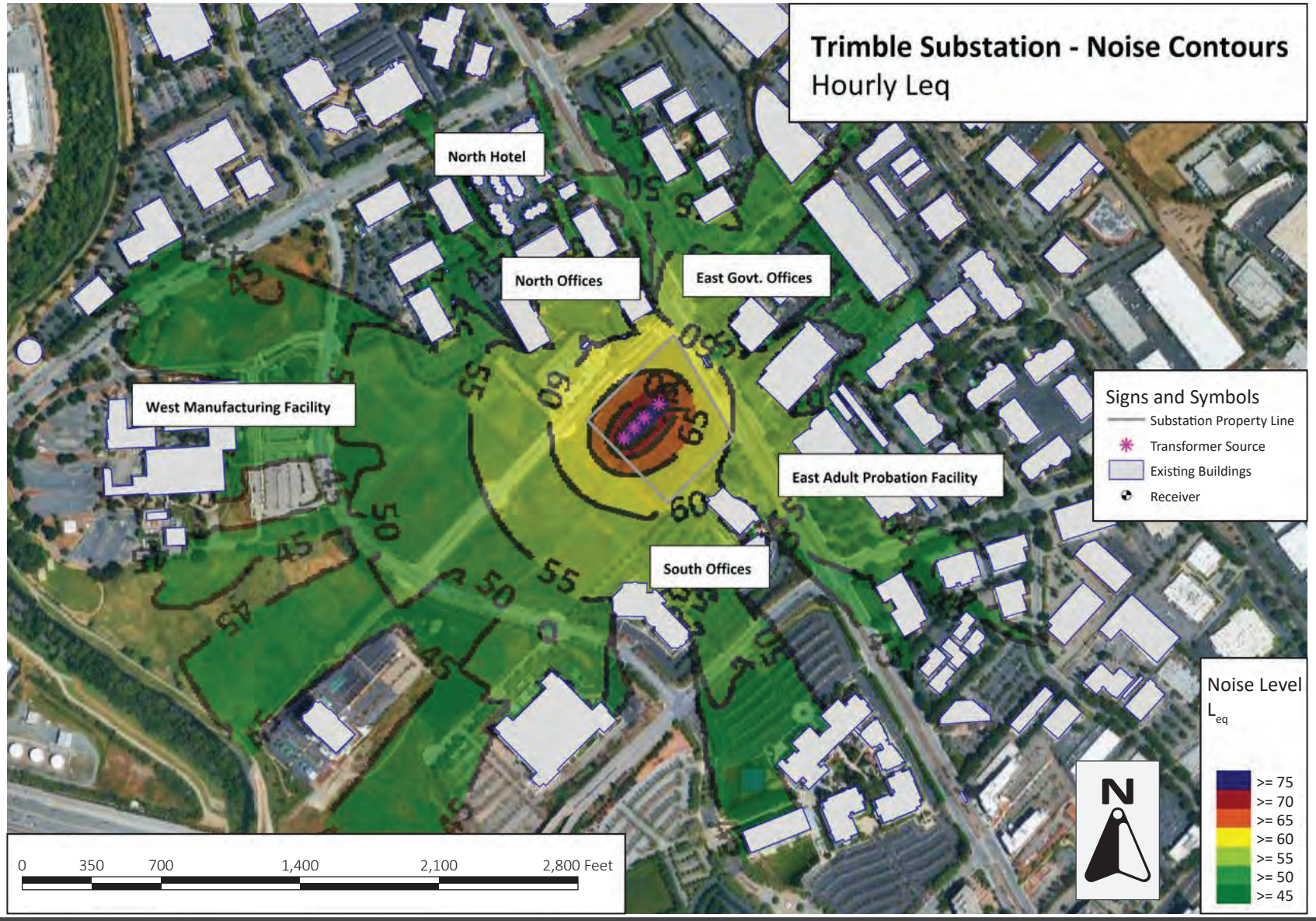
Trimble Substation Expansion

The Trimble Substation Expansion would have occasional maintenance trips but would otherwise not generate any vehicle trips; thus, it is presumed traffic noise generated by the substation would not be measurable and is not discussed further.

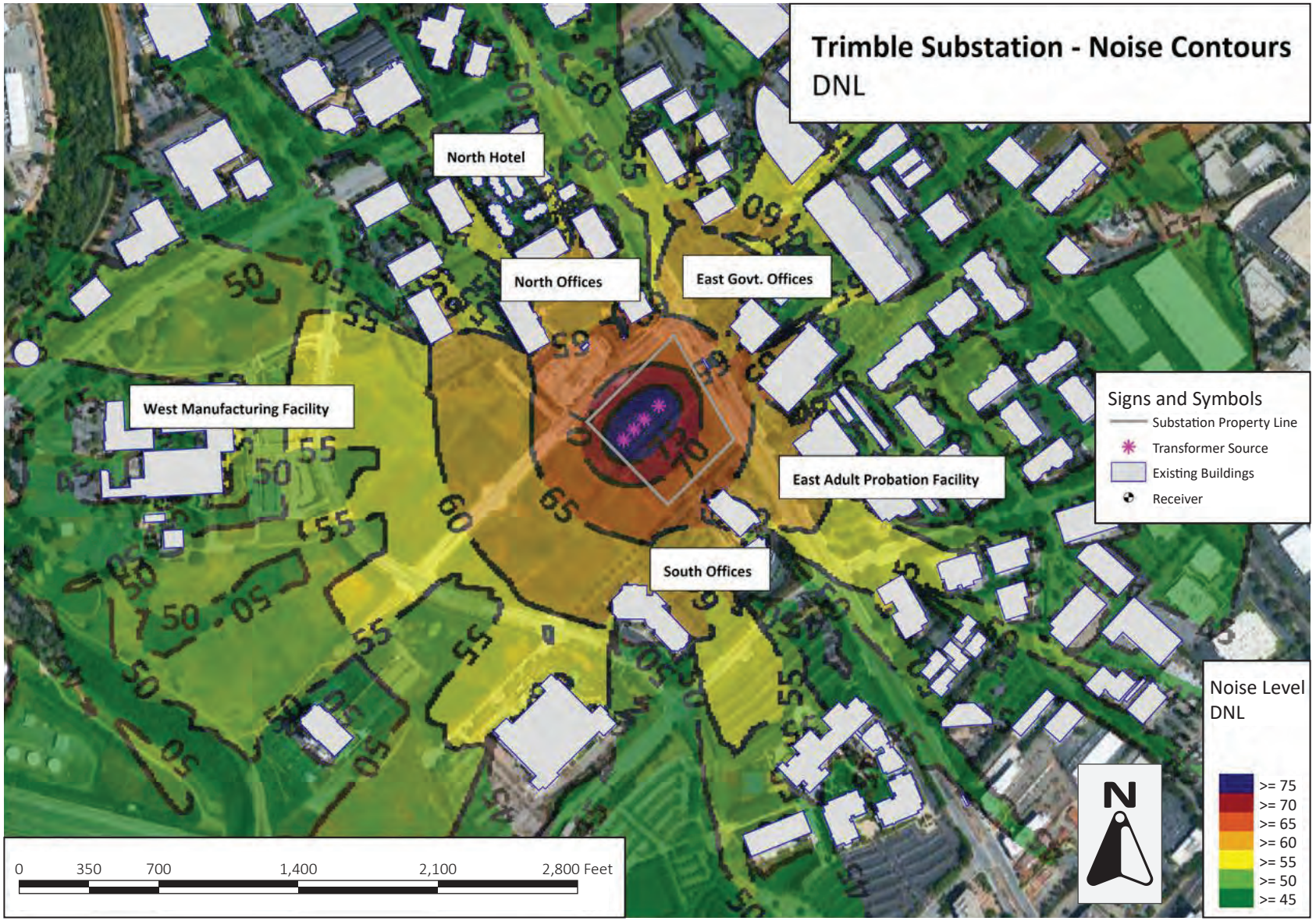
The Trimble Substation Expansion would contain two 230/115-kV transformers, two GIS enclosures, associated 230-kV and 115-kV switchgear, station service transformers, and auxiliary control equipment. The main operational noise source, however, would be the two transformers, as the other equipment would be quieter and not significantly contribute to the overall operational noise level. Specific equipment information and acoustical data is currently not available for the proposed transformers; thus, this analysis uses a conservative A-weighted sound power level of 106 dBA, which is based on published utility environmental documents, manufacturer information, and industry guidance for large transmission transformers operating under normal cooling conditions. The assumed source level was intended to represent the combined noise from transformer core vibration, radiator cooling fans, and auxiliary cooling equipment operating during normal service. The GIS equipment, including internal circuit breakers, disconnect switches, buswork, and associated electrical equipment, was not modeled as a continuous operational noise source. These components are enclosed within the GIS buildings and do not normally produce appreciable steady-state exterior noise. Similarly, outdoor circuit breakers, disconnect switches, instrument transformers, buswork, transmission structures, battery systems, and control equipment were not assigned continuous operational sound sources because these components are generally acoustically insignificant during normal operation. Switching operations may produce short-duration impulsive sounds but were not evaluated as part of the continuous operational noise assessment.

To calculate the Trimble Substation Expansion noise levels, SoundPLAN (version 9.0), was used to predict L_{eq} and DNL during continuous operation of all transformers on-site. To model the worst-case scenario, no attenuation was assumed from GIS enclosures, security wall, or other planned structures.

Figure 4.13-6 and Figure 4.13-7 show the hourly average L_{eq} and the DNL noise levels during substation operation, respectively.



HOURLY AVERAGE NOISE CONTOURS (L_{eq}) FOR TRIMBLE SUBSTATION EXPANSION OPERATION | FIGURE 4.13-6



NOISE CONTOURS (DNL) FOR TRIMBLE SUBSTATION EXPANSION OPERATION

FIGURE 4.13-7

As shown in Figure 4.13-6 and Figure 4.13-7, noise levels expected from the substation operations are expected to be 60 dBA L_{eq} or less and 68 dBA DNL or less at all surrounding industrial use receptors. Therefore, noise levels the surrounding industrial land uses would remain below the City's Municipal Code threshold of 70 dBA at receiving industrial uses. The closest sensitive noise use to the Trimble Substation Expansion Site is a hotel located 1,000 feet northwest of the site. At this distance operational noise levels would be approximately 48 dBA L_{eq} or less and 55 dBA DNL or less. Therefore, noise levels at the hotel would remain below the City's Municipal Code threshold of 55 dBA at receiving residential uses.

Based on the discussion above, operational noise from the Trimble Substation Expansion would be less than significant. **(Less than Significant Impact)**

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction of the Project may generate vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used. Construction activities would include demolition, grading, foundation work, paving, and new building framing and finishing. According to the equipment list provided at the time of this study, impact or vibratory pile driving activities, which can cause excessive vibration, are not expected for the proposed project.

According to Policy EC-2.3 of the City of San José General Plan, a vibration limit of 0.08 in/sec PPV shall be used to minimize the potential for cosmetic damage to sensitive historical structures, and a vibration limit of 0.20 in/sec PPV shall be used to minimize damage at buildings of normal conventional construction. The vibration limits contained in this policy are conservative and designed to provide the ultimate level of protection for existing buildings in San José.

Groundborne vibration levels exceeding the 0.08 in/sec PPV threshold would have the potential to result in a significant vibration impact on historic buildings. According to the San Jose Historic Resource Inventory, the closest historical building to the Project Component Sites is the Sakauye Residence, located at 2343 N. First Street and 275 feet southeast of the Trimble Substation Expansion Site. At this distance, groundborne vibration levels would be below 0.02 in/sec PPV; thus, no historic building would be impacted by the construction of the Project. The vibration limit of 0.20 in/sec PPV would apply to surrounding normal conventional buildings, though.

Table 4.13-8 presents typical vibration levels that could be expected from construction equipment at a distance of 25 feet. Project construction activities, such as drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.), may generate substantial vibration in the immediate vicinity. Jackhammers typically generate vibration levels of 0.035 in/sec PPV, and drilling typically generates vibration levels of 0.09 in/sec PPV at a distance of 25 feet.

Table 4.13-8: Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 ft. (in/sec)	Minimum Distance to Meet 0.2 in/sec PPV (feet)
Clam shovel drop		0.202	26
Hydromill (slurry wall)	in soil	0.008	2
	in rock	0.017	3
Vibratory Roller		0.210	27
Hoe Ram		0.089	13
Large bulldozer		0.089	13
Caisson drilling		0.089	13
Loaded trucks		0.076	11
Jackhammer		0.035	6
Small bulldozer		0.003	<1

Illingworth & Rodkin. *Charcot Avenue Data Center Project Noise and Vibration Assessment*. October 2026. Table 13.

The nearest off-site buildings are located 80 feet from the CABGF/CADC and Trimble Substation Expansion Sites. Construction vibration levels at this distance would be below 0.06 in/sec PPV, which is below the threshold of 0.20 in/sec PPV. The nearest buildings along the PG&E transmission line routes would be between 45 to 50 feet, which is greater than the minimum distance of 27 feet (see Table 4.13-8) needed to achieve the 0.2 in/sec PPV threshold.

All other existing buildings in the vicinity of the site are located more than 45 feet away from project construction. Neither cosmetic, minor, or major damage would occur at historical or conventional buildings located 45 feet or more from the Project Component Sites. At these locations, and in other surrounding areas where vibration would not be expected to cause cosmetic damage, vibration levels may still be perceptible. However, as with any type of construction, this would be anticipated and would not be considered significant, given the intermittent and short duration of the phases that have the highest potential of producing vibration (use of jackhammers and other high-power tools).

With compliance with PDM NOI-1, such as notifying neighbors of scheduled construction activities and identifying when the noisy activities would be scheduled, perceptible vibration can be kept to a minimum. Therefore, construction of the Project would not generate vibration levels exceeding the 0.2 in/sec PPV threshold at conventional off-site buildings surrounding the project site. **(Less than Significant Impact)**

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

San José Mineta International Airport is a public-use airport located approximately one mile southwest of the Project Component Sites. According to the new Airport Master Plan Environmental Impact Report, the Project Component Sites lie outside the 60 dBA CNEL noise contour, which is in the "Generally Acceptable" range of the Santa Clara County CLUP noise compatibility limits for industrial use areas. Therefore, the Project Component Sites are compatible with the City's exterior noise standards for aircraft noise. **(Less than Significant Impact)**

4.13.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant noise impact?

The noise and vibration impacts from the Project are localized; therefore, the geographic study area is the Project Components Sites and surrounding area (i.e., within 1,000 feet of the Project Components Sites). There is one planned project within 1,000 feet of the CABGF/CADC and Trimble Substation Expansion Sites. It is located at 370 W. Trimble Road and would include two, four-story data center buildings. The nearest sensitive receptor exposed to the proposed Project and the 370 W. Trimble project would be the west office and manufacturing buildings. These buildings are located more than 860 feet from the nearest boundary of the Trimble Substation Expansion Site, but only 125 feet from the 370 W. Trimble Road site. Therefore, even if construction occurred concurrently at both sites, construction activities at the 370 W. Trimble Road site would be closer to the buildings and, therefore, noise generated by construction at that site would dominate the temporary noise environment. Construction noise levels from the Trimble Substation Expansion Site is not expected to exceed 66 dBA L_{eq}. Therefore, with the incorporation of PDM NOI-1, construction noise would be minimal and would not contribute to a cumulative construction noise impact. As discussed under checklist question a), the Project would not generate a significant number of vehicle trips and would have no noticeable effect on traffic noise in the area. Therefore, the Project would have a less than significant cumulative construction and operational noise impact. **(Less than Significant Cumulative Impact)**

4.14 Population and Housing

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.[152] The City of San José Housing Element and related land use policies were last updated in June 2023.

Regional and Local

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified Priority Development Areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[153]

ABAG allocates regional housing needs to each city and county within the San Francisco Bay Area, based on statewide goals. These allocations are designed to lay the foundation for Plan Bay Area 2050's long-term envisioned growth pattern for the region. ABAG also develops a series of forecasts and models to project the growth of population, housing units, and jobs in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Forecasting and Modeling Report, which is a technical overview of the growth forecasts and land use models upon which Plan Bay Area 2050 is based.

[152] California Department of Housing and Community Development. "Current Housing Planning Process." Accessed March 3, 2025. https://www.hcd.ca.gov/rhna/process.
[153] Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021. Page 20.

City of San José Housing Element 2023-2031

The Housing Element is part of San José's General Plan, a community-based plan that serves as the blueprint for the City's growth. The Housing Element identifies the city's housing needs and opportunities and establishes goals and strategies to inform housing decisions. The plan is intended to achieve the construction of 62,200 units of residential development by 2031 with a variety of household types serving all income levels. The City has an expected population growth of 360,000 residents by 2040.

4.14.1.2 *Existing Conditions*

The residential population of San José was estimated to be approximately 963,211 in January 2025 with an average of 2.88 persons per household.[154] The City currently has a total population of 979,415.[155] Full build out of the General Plan includes 120,000 new dwelling units and 470,000 new jobs by 2035.[156] Development approved under the General Plan is projected to increase the City's residential population to 1,313,811.[157]

The City currently has a higher number of employed residents than jobs (approximately 0.8 jobs per employed resident), but this trend is projected to reverse with full build out under the General Plan. The General Plan assumptions, as amended in the first Four-Year Review in 2016, envision a Jobs/Employee Resident ratio of 1.1/1 or 382,200 new jobs by 2040.[158] To meet the current and projected housing needs in the City, the 2040 General Plan identifies areas for mixed-use and residential development to accommodate 120,000 new dwelling units by 2040.[159]

The CABGF/CADC Site is currently developed with five light industrial and warehouse buildings and is improved with asphalt-paved parking areas and driveways, concrete-paved loading docks, associated landscaping, drainage features, perimeter fencing, and dumpster and equipment enclosures. The Trimble Substation Expansion Site is an undeveloped parcel. The proposed PG&E transmission line are within the roadway right-of-way. Surrounding uses consist of industrial and office uses.

[154] State of California, Department of Finance. "E-5 Population and Housing Estimate for Cities, Counties, and the State – January 2021-2025." May 2025. Accessed March 3, 2026. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/.
[155] Ibid.
[156] City of San José. *Envision San José 2040 General Plan Integrated Final Program Environmental Impact Report.* SCH: 2009072096. September 2011. Page 770.
[157] Ibid. Table 3.1 4-4.
[158] City of San José. *Addendum to the Envision San José 2040 General Plan Final Program Environmental Impact Report and Supplemental Program Environmental Impact Report*. November 2016. Page 8.
[159] Ibid. Page 11.

4.14.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
Would the project result in a cumulatively considerable contribution to a cumulatively significant population and housing impact?	☐	☐	☒	☐

4.14.2.1 *Project Impacts*

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The Project would result in the construction of a data center building, backup generating facility, and new PG&E electrical infrastructure (Trimble Substation Expansion and PG&E transmission lines). The Trimble Substation Expansion and proposed transmission lines would not generate any new employment since these uses would be maintained by current PG&E employees. The CABGF/CADC would be a low employment generating use that is not anticipated to substantially increase permanent jobs in San José. The CADC is expected to generate a maximum of 45 employees. The Project would result in a temporary increase in jobs during construction; however, this temporary increase would not result in substantial permanent population growth in the area. For these reasons, the proposed Project would not induce substantial population growth in the City or substantially alter the City's job/housing ratio and would, therefore, result in a less than significant population and housing impacts. **(Less than Significant Impact)**

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Project Components would not include residences or generate new residents. Therefore, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **(No Impact)**

4.14.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant population and housing impact?

The Project would not remove any residences or displace any people. Other cumulative projects proposed in San José could potentially remove housing and/or facilitate unplanned growth; however, the City's Housing Element to the General Plan incorporates a land use vision for the planned build out to 2040, which would utilize existing areas within the City's Urban Growth Boundary to increase residential development. New housing developments as part of the General Plan buildout would focus on an intensification of land use in already developed areas.

The General Plan Final Program EIR identified a significant unavoidable impact related to a project jobs/housing imbalance with full buildout of the General Plan.[160] As mentioned above in checklist question a), the CADC would be a low employment-generating use. Approval of the Project would result in a minor increase of the overall jobs represented by the cumulative projects. For this reason, the jobs added by the CADC would not make a cumulatively considerable contribution to a worsening of the jobs/housing imbalance. **(Less than Significant Cumulative Impact)**

[160] City of San José. *Integrated Final Program Environmental Impact Report for the Envision San José 2040 General Plan.* SCH# 2009072096. September 2011. Page 776.

4.15 Public Services

4.15.1 Environmental Setting

4.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Regional and Local

Countywide Trails Master Plan

The Santa Clara County Trails Master Plan Update is a regional trails plan approved by the Santa Clara County Board of Supervisors. It provides a framework for implementing the County's vision of providing a contiguous trail network that connects cities to one another, cities to the county's regional open space resources, County parks to other County parks, and the northern and southern urbanized regions of the County. The plan identifies regional trail routes, sub-regional trail routes, connector trail routes, and historic trails. The nearest recreational facility is the Guadalupe River

Trail approximately 0.5-mile southwest of the Trimble Substation Expansion Site and approximately one mile southwest of the CABGF/CADC site.[161]

Envision San José 2040 General Plan

The following General Plan policies are specific to public services and are applicable to the proposed project.

Policies	Description
ES-3.9	Implement urban design techniques that promote public and property safety in new development through safe, durable construction and publicly-visible and accessible spaces.
ES-3.11	Ensure that adequate water supplies are available for fire-suppression throughout the City. Require development to construct and include all fire suppression infrastructure and equipment needed for their projects.
PR-2.4	To ensure that residents of a new project and existing residents in the area benefit from new amenities, spend Park Dedication Ordinance (PDO) and Park Impact Ordinance (PIO) fees for neighborhood serving elements (such as playgrounds/tot-lots, basketball courts, etc.) within a ¾ mile radius of the project site that generates the funds.

Parkland Dedication Ordinance and Park Impact Ordinance

The City of San José has adopted the Parkland Dedication Ordinance (PDO, Municipal Code Chapter 19.38) and Park Impact Ordinance (PIO, Municipal Code Chapter 14.25), requiring new residential development to either dedicate sufficient land to serve new residents or pay fees to offset the increased costs of providing new park facilities for new development. Under the PDO and PIO, a project can satisfy half of its total parkland obligation by providing private recreational facilities on-site. The acreage of parkland required is based on the minimum acreage dedication formula outlined in the PDO.

ActivateSJ Strategic Plan (2020-2040)

The ActivateSJ Strategic Plan is the latest 20-year strategic plan for the City of San José's Department of Parks, Recreation, and Neighborhood Services.[162] This plan does not replace the Greenprint 2009 update but instead is a complement to the Greenprint document and focuses more on the daily operations of the Department of Parks, Recreation, and Neighborhood Services. ActivateSJ includes key plan outcomes to support the following guiding principles: stewardship, nature, equity and access, identify, and public life. These guiding principles also align with the specific goals and policies of the General Plan.

[161] City of San José. "San José Parks Finder." Accessed March 3, 2026. https://csj.maps.arcgis.com/apps/webappviewer/index.html?id=93ae7909fe8f4b758daa5a73baa895c3
[162] City of San José. "ACTIVATESJ Strategic Plan (2020-2040)." 2020. Accessed March 3, 2026. Page 2. https://www.sanjoseca.gov/home/showpublisheddocument/43503/637178743945470000

4.15.1.2 *Existing Conditions*

Fire Protection Services

Fire protection services for the Project Component Sites are provided by the San José Fire Department, which is one of the busiest fire departments in the county with the fire department responding to approximately 109,000 service calls per year and serving over 1.2 million residents.[163] The San José Fire Department consists of 34 stations distributed throughout the City. Per General Plan Policy E.S-3.1, the response time goal for fire protection is eight minutes and a total travel time of four minutes for 80 percent of emergency incidents.

The closest fire station is Station 5, located at 1380 N. 10th Street, which is approximately 1.3 miles southeast of the Project Component Sites.

Police Protection Services

Police protection services are provided by the City of San José Police Department. The San José Police Department employs approximately 1,700 employees including both sworn and non-sworn, who are assigned to one of the 70 specialized units and assignments in the department.[164] Per General Plan Policy E.S-3.1, a police protection service goal is six minutes or less for 60 percent of all Priority 1 (emergency) calls and 11 minutes or less for 60 percent of all Priority 2 (non-emergency) calls. The police headquarters is located at 201 West Mission Street, approximately 2.2 miles south of the Project Component Sites.

Schools

The Project Component Sites are located within the Orchard School District for elementary and middle school and in the East Side Union High School District.[165] The nearest school is Orchard Elementary School (921 Fox Lane) approximately 0.8 mile northeast of the CABGF/CADC site.

Parks

The City's Department of Parks, Recreation, and Neighborhood Services is responsible for the development, operation, and maintenance of all City park facilities. The City operates and maintains regional and neighborhood/community-serving parkland, including 206 parks, 50 community centers, and over 61 miles of trails.[166] The nearest recreational facility is the Guadalupe River Trail

[163] City of San José. "About SJFD." Accessed March 5, 2026. https://www.sanjoseca.gov/your-government/departments-offices/fire-department/about-sjfd#:~:text=The%20San%20Jos%C3%A9%20Fire%20Department,areas%20of%20Santa%20Clara%20County.
[164] San José Police Department. "Department Information." Accessed March 6, 2026. https://www.sjpd.org/about-us/inside-sjpd/department-information.
[165] County of Santa Clara. "Real Property Search." Accessed April 29, 2026. https://www.sccassessor.org/online-services/property-search/real-property.
[166] City of San José. "ACTIVATESJ Strategic Plan (2020-2040)." 2020. Accessed March 3, 2026. Page 6. https://www.sanjoseca.gov/home/showpublisheddocument/43503/637178743945470000.

approximately 0.5 mile southwest of the Trimble Substation Expansion Site and one mile southwest of the CABGF/CADC Site.

Libraries and Community Centers

The City of San José is served by the San José Public Library System. The San José Public Library System consists of one main library (Dr. Martin Luther King Jr.) and 25 branch libraries.[167] The nearest library the Joyce Ellington Library, located approximately 2.7 miles southeast of the CABGF/CADC Site.

The City of San José operates 50 community centers within the City limits.[168] The nearest community center is the Jacinto Siquig Northside Community Center approximately 2.6 miles southeast of the CABGF/CADC site.[169]

4.15.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire Protection?	☐	☐	☒	☐
b) Police Protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other Public Facilities?	☐	☐	☐	☒
Would the project result in a cumulatively considerable contribution to a cumulatively significant public services impact?	☐	☐	☒	☐

[167] San José Public Library. "Locations & Hours Table." Accessed March 9, 2026. https://www.sjpl.org/locations-table/.
[168] City of San José. "ACTIVATESJ Strategic Plan (2020-2040)." 2020. Accessed March 3, 2026. Page 6. https://www.sanjoseca.gov/home/showpublisheddocument/43503/637178743945470000.
[169] City of San José. "Community Center." Updated February 10, 2026. Accessed April 29, 2026. https://gisdata-csj.opendata.arcgis.com/datasets/CSJ::community-center/about.

4.15.2.1 *Project Impacts*

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services?

The Project Component Sites are infill projects located within an urbanized part of San José that is already served by the San José Fire Department. The CADC would generate a maximum of 45 employees within the area. The Trimble Substation Expansion and PG&E transmission lines would not generate new employees in the Project area.

The proposed CABGF/CADC would be constructed to meet the City's Municipal and Fire Codes, which would ensure the CABGF/CADC would be adequately served by the existing fire services. While the Project may result in an incremental increase in the need for fire protection services due to the increased building area at the CABGF/CADC Site, the Project would not be substantial enough to warrant modification of existing or construction of new fire service facilities beyond what is projected in the General Plan.

In the event that new facilities are required as a result of cumulative growth in the area, the City would conduct additional environmental analysis, based on the location and details of any proposed new public facilities, to determine if significant environmental impacts would occur, and devise adequate measure to mitigate any significant impacts. For these reasons, the Project would not require the construction of new or expanded fire facilities and impacts would be less than significant. **(Less than Significant Impact)**

b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services?

Similar to analysis in Checklist a) above, the Project Component Sites are infill projects located within an urbanized part of San José that is already served by the San José Fire Department. The Project may result in an incremental increase in the need for police services associated due to increased building area at the CABGF/CADC Site. While the Project may result in an incremental increase in the need for police protection services due to the increased building area, the Project would not be substantial enough to warrant modification of existing or construction of new police service facilities beyond what is projected in the General Plan. Also, the construction of any expanded police department facilities would require environmental review and would not be anticipated to result in significant adverse environmental impacts. For these reasons, the Project

would have less than significant impacts on police protection services. **(Less than Significant Impact)**

c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools?

The Project would include the CABGF/CADC, Trimble Substation Expansion, and PG&E transmission line routes. None of these proposed uses would generate new residents or students. Moreover, construction of the CABGF/CADC would require the project applicant to pay applicable school impact fees pursuant to SB 50. Therefore, the Project would not require new or expanded school facilities, the construction of which could cause environmental impacts. **(No Impact)**

d) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks?

The Project would include the CABGF/CADC, Trimble Substation Expansion, and PG&E transmission line routes, which are not developments that would generate new residents. Some employees at the CADC may visit local parks, such as the Guadalupe River Trail; however, this usage would represent a negligible increase and would not create the need for any new facilities or adversely impact the physical condition of existing facilities. **(No Impact)**

e) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities?

The Project would include the CABGF/CADC, Trimble Substation Expansion, and PG&E transmission line routes, which are not developments that would generate new residents. Some employees at the CADC may visit library facilities; however, this would be a negligible use increase and would not create the need for any new facilities or adversely impact the physical condition of existing facilities. **(No Impact)**

4.15.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant public services impact?

The geographic area for cumulative public services impacts is the City of San José. All cumulative projects would be required to be built in conformance with then-current Building and Fire Codes and public safety requirements in the General Plan. The Project would not develop residences, and therefore, would not result in a cumulatively considerable contribution to a cumulative school, library, or park and recreational facility impacts. For this reason, the cumulative projects would result in a less than significant cumulative impact to police, fire, and recreational facilities. **(Less than Significant Cumulative Impact)**

4.16 Recreation

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Local

Envision San José 2040 General Plan

The following General Plan policies are specific to recreational resources and are applicable to the proposed Project.

Policy	Description
PR-2.4	To ensure that residents of a new project and existing residents in the area benefit from new amenities, spend Park Dedication Ordinance and Park Impact Ordinance fees for neighborhood serving elements (such as playgrounds/tot-lots, basketball courts, etc.) within a ¾ mile radius of the project site that generates the funds.
PR-2.5	Spend, as appropriate, PDO/PIO fees for community serving elements (Such as soccer fields, community gardens, community centers, etc.) within a 3-mile radius of the residential development that generates the PDO/PIO funds.

Greenprint

The Greenprint is a strategic plan to guide the City's expansion of parks, recreation facilities, and community services. The plan was first adopted by City Council in 2000 then updated in 2009.[170] The Greenprint contains strategies to support the overall mission of providing healthy communities through people, parks, and programs. The Greenprint identifies areas of the City that are underserved by park and recreation facilities and includes policies and strategies to correct those deficiencies. The General Plan incorporated the Greenprint 2009 strategies.

[170] City of San José. "Greenprint 2009 Documents." Accessed March 3, 2025. https://www.sanjoseca.gov/your-government/departments-offices/parks-recreation-neighborhood-services/general-information/policies-reports/residents.

ActivateSJ Strategic Plan (2020-2040)

The ActivateSJ Strategic Plan is the latest 20-year strategic plan for the City of San José's Department of Parks, Recreation, and Neighborhood Services.[171] This plan does not replace the Greenprint 2009 update but instead is a complement to the Greenprint document and focuses more on the daily operations of the Department of Parks, Recreation, and Neighborhood Services. ActivateSJ includes key plan outcomes to support the following guiding principles: stewardship, nature, equity and access, identify, and public life. These guiding principles also align with the specific goals and policies of the General Plan.

4.16.1.2 *Existing Conditions*

The City's Department of Parks, Recreation, and Neighborhood Services is responsible for the development, operation, and maintenance of all City park facilities. The City operates and maintains regional and neighborhood/community-serving parkland, including 206 parks, 50 community centers, and over 61 miles of trails.[172]

The nearest recreational facility is the Guadalupe River Trail approximately 0.5 mile southwest of the Trimble Substation Expansion Site and one mile southwest of the CABGF/CADC Site.

4.16.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
c) Would the project result in a cumulatively considerable contribution to a cumulatively significant recreation impact?	☐	☐	☒	☐

[171] City of San José. "ACTIVATESJ Strategic Plan (2020-2040)." 2020. Accessed March 3, 2026. Page 2. https://www.sanjoseca.gov/home/showpublisheddocument/43503/637178743945470000

[172] Ibid. Page 6.

4.16.2.1 *Project Impacts*

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The Project proposes to develop industrial uses (i.e., CABGF/CADC, Trimble Substation Expansion, and PG&E transmission line) with no residential development included. While employees of the CADC may utilize parks and recreational facilities in the area, such as the Guadalupe River Trail, the Project would not generate demand for neighborhood or regional park facilities, such that substantial physical deterioration of these facilities would occur or be accelerated. **(Less than Significant Impact)**

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed Project would not include recreational facilities. Some employees of the CADC may use nearby parks and recreational facilities as mentioned above in checklist question a); however, this would not represent a substantial increase and would not require the construction or expansion of recreational facilities. **(No Impact)**

4.16.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant recreation impact?

Other projects developed in San José (such as residential projects) could increase the use of recreational facilities, including neighborhood and regional parks and community centers, to the point of disrepair. In the San José General Plan Program EIR, the City identified that with expected population growth through 2035 (1,313,811 residences) additional parks and community centers would be required to accommodate the increase in population.[173] Existing City policies and regulations, such as the Parkland Dedication Ordinance and Parkland Impact Ordinance, function to collect fees from new development (or require parkland to be dedicated) for the purpose of maintaining the City's service level objectives. By requiring cumulative projects to adhere to existing policies and regulations, the cumulative impact of future development on recreational facilities would be minimized.

[173] City of San José. *Envision San José 2040 General Plan Integrated Final Program Environmental Impact Report.* SCH: 2009072096. September 2011. Page 619.

The proposed Project does not include new residential development; therefore, its impact on nearby recreational facilities would be minimal. When combined with other projects in in San José, the Project would not result in a cumulatively considerable contribution to this already less than significant cumulative recreation impact. **(Less than Significant Cumulative Impact)**

4.17 Transportation

The following discussion is based, in part, on a Transportation Analysis prepared by Hexagon Transportation Consultants, Inc dated July 31, 2026. The Transportation Analysis is included in this SPPE Application as Appendix M. In this report, mitigation measures are recommended to reduce impacts. The Applicant has incorporated these recommendations into PDMs as discussed below.

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by the Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Regional and Local

Regional Transportation Plan

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including Santa Clara County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2050 in October 2021, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2050.

Congestion Management Program

VTA oversees the Congestion Management Program (CMP), which is aimed at reducing regional traffic congestion. The relevant state legislation requires that urbanized counties in California

prepare a CMP in order to obtain each county's share of gas tax revenues. State legislation requires that each CMP define traffic LOS standards, transit service standards, a trip reduction and transportation demand management plan, a land use impact analysis program, and a capital improvement element. VTA has review responsibility for proposed development projects that are expected to affect CMP-designated intersections.

Transportation Analysis Policy (City Council Policy 5-1)

As established in City Council Policy 5-1, Transportation Analysis Policy, the City of San José uses VMT as the metric to assess transportation impacts from new development. According to the policy, residential project's transportation impact would be less than significant if the project VMT is 15 percent or more below the existing average citywide VMT per capita. Screening criteria have been established to determine which projects require a detailed VMT analysis. If a project meets the relevant screening criteria, it is considered to have a less than significant VMT impact.

If a project's VMT does not meet the established thresholds, mitigation measures would be required, where feasible. The policy also requires preparation of a Local Transportation Analysis to analyze non-CEQA transportation issues, including local transportation operations, intersection level of service, site access and circulation, and neighborhood transportation issues such as pedestrian and bicycle access and recommend transportation improvements. The VMT policy does not negate Area Development policies and Transportation Development policies approved prior to adoption of Policy 5-1; however, it does negate the City's Protected Intersection policy as defined in Policy 5-3.

San José Better Bike Plan 2025

The San José Better Bike Plan 2025 defines the City's vision to make bicycling safe and convenient for all ages and abilities in San José. The plan is organized around three primary goals: 1) increasing safety for bicyclists in the City, 2) increasing the number of trips made by bike in San José, and 3) ensuring that the plan serves historically underserved communities. [174] The plan outlines existing conditions, describes the planned bicycle network, and offers details on the implementation strategy required to realize the planned network. The Better Bike Plan 2025 defines clear goals to build off of the successes of Bike Plan 2020.

Envision San José 2040 General Plan

The General Plan includes the following transportation policies applicable to the proposed project.

Policy	Description
TR-1.1	Accommodate and encourage use of non-automobile transportation modes to achieve San José's mobility goals and reduce vehicle trip generation and vehicle miles traveled (VMT).

[174] City of San José. San José Better Bike Plan 2025. October 2020. Accessed May 22, 2024. https://www.sanjoseca.gov/home/showpublisheddocument/68962/637477999451470000.

Policy	Description
TR-1.2	Consider impacts on overall mobility and all travel modes when evaluating transportation impacts of new developments or infrastructure projects.
TR-1.4	Through the entitlement process for new development, fund needed transportation improvements for all transportation modes, giving first consideration to improvement of bicycling, walking and transit facilities. Encourage investments that reduce vehicle travel demand. Development proposals shall be reviewed for their impacts on all transportation modes through the study of Vehicle Miles Traveled (VMT), Envision San José 2040 General Plan policies, and other measures enumerated in the City Council Transportation Analysis Policy and its Local Transportation Analysis. Projects shall fund or construct proportional fair share mitigations and improvements to address their impacts on the transportation systems. The City Council may consider adoption of a statement of overriding considerations, as part of an EIR, for projects unable to mitigate their VMT impacts to a less than significant level. At the discretion of the City Council, based on CEQA Guidelines Section 15021, projects that include overriding benefits, in accordance with Public Resources Code Section 21081 and are consistent with the General Plan and the Transportation Analysis Policy 5-1 may be considered for approval. The City Council will only consider a statement of overriding considerations for (i) market-rate housing located within General Plan Urban Villages; (ii) commercial or industrial projects; and (iii) 100% deed-restricted affordable housing as defined in General Plan Policy IP-5.12. Such projects shall fund or construct multimodal improvements, which may include improvements to transit, bicycle, or pedestrian facilities, consistent with the City Council Transportation Analysis Policy 5-1. Area Development Policy. An “area development policy” may be adopted by the City Council to establish special transportation standards that identifies development impacts and mitigation measures for a specific geographic area. These policies may take other names or forms to accomplish the same purpose.
TR-1.6	Require that public street improvements provide safe access for motorists and pedestrians along development frontages per current City design standards.
TR-2.8	Require new development where feasible to provide on-site facilities such as bicycle storage and showers, provide connections to existing and planned facilities, dedicate land to expand existing facilities or provide new facilities such as sidewalks and/or bicycle lanes/paths, or share in the cost of improvements.
TR-3.3	As part of the development review process, require that new development along existing and planned transit facilities consist of land use and development types and intensities that contribute towards transit ridership. In addition, require that new development is designed to accommodate and to provide direct access to transit facilities.
TR-5.3	Development projects’ effects on the transportation network will be evaluated during the entitlement process and will be required to fund or construct improvements in proportion to their impacts on the transportation system. Improvements will prioritize multimodal improvements that reduce VMT over automobile network improvements.
TR-8.4	Discourage, as part of the entitlement process, the provision of parking spaces significantly above the number of spaces required by code for a given use.

Policy	Description
TR-8.6	Allow reduced parking requirements for mixed-use developments and for developments providing shared parking or a comprehensive TDM program, or developments located near major transit hubs or within Villages and Corridors and other growth areas.
TR-8.9	Consider adjacent on-street and City-owned off-street parking spaces in assessing need for additional parking required for a given land use or new development.

4.17.1.2 *Existing Conditions*

The Trimble Substation Expansion and PG&E transmissions lines would not generate traffic other than occasional maintenance trips. As a result, the discussion below focuses on the CABGF/CADC Site.

Roadway Network

Regional access to the CABGF/CADC Site is provided via United States Highway 101 (US 101), Interstate 880 (I-880), and State Route 87 (SR-87). Local access to the Site is provided by First Street, Zanker Road, Brokaw Road, Charcot Avenue, and Trimble Road. These roadway facilities are described below.

US 101

US 101 is an eight-lane freeway (three mixed-flow lanes and one HOV lane in each direction) in the vicinity of the Site. US 101 extends northward through San Francisco and southward through Gilroy. Access to the Site from US 101 is provided via an interchange at Brokaw Road and northbound ramps at Bayshore Highway.

I-880

I-880 is an eight-lane freeway (three mixed-flow lanes and one HOV lane in each direction) in the vicinity of the project Site. I-880 extends along the eastern side of San Francisco Bay from the north in Oakland to San Jose in the south, where it becomes SR-17. Access to the Site from I-880 is via an interchange at Brokaw Road.

SR 87

SR-87 is a six-lane freeway (two mixed-flow lanes and one HOV lane in each direction) in the vicinity of the Site. SR 87 extends from its northern terminus at Charcot Avenue to its interchange with SR-85 in the south. Access to the Site from SR-87 is provided via Charcot Avenue.

First Street

First Street is a designated Grand Boulevard per the General Plan that extends from the north San José area through downtown San José. In the project vicinity, First Street is a four-lane divided

roadway with bike lanes on both sides of the street. The VTA Light Rail Transit (LRT) Blue and Green Lines run within the median of First Street between downtown San José and Tasman Drive in north San José. Sidewalks are provided on both sides of the street. The posted speed limit is 45 miles per hour (mph). Access to and from the Site is provided via its intersections with Charcot Avenue and Brokaw Road.

Zanker Road

Zanker Road is a designated City Connector Street per the General Plan that extends from US 101 in the south towards past SR-237 in the north, where it transitions to Los Esteros Road. In the project vicinity, Zanker Road is a four-lane roadway with bike lanes in both directions. Sidewalks are intermittent on both sides of the street in the project vicinity. The posted speed limit is 45 mph. Zanker Road runs along the western project frontage. Zanker Road provides direct access to the Site.

Brokaw Road

Brokaw Road is a designated City Connector Street per the General Plan that extends from Technology Place in the west, where it becomes Airport Parkway to Oakland Road in the east, where it becomes Murphy Avenue. In the project vicinity, Brokaw Road is a six-lane arterial with buffered bike lanes on both sides of the street. Sidewalks are intermittent on both sides of the street in the project vicinity. The posted speed limit is 40 mph. Access to and from the Site is provided via its intersection with Zanker Road.

Charcot Avenue

Charcot Avenue is a designated On-Street Primary Bicycle Facility per the General Plan that extends from the US 101/SR-87 junction at the SR-87 off- and on-ramps in the west to O'Toole Avenue in the east, just west of I-880, where it terminates. In the project vicinity, Charcot Avenue is a two-lane roadway with bike lanes on both sides of the street. Sidewalks are intermittent on both sides of the street in the project vicinity. The posted speed limit is 35 mph. Charcot Avenue runs along the northern project frontage. Access along the Charcot Avenue frontage would be limited to an emergency vehicle access driveway.

Trimble Road

Trimble Road is a designated City Connector Street per the General Plan that extends from De La Cruz Boulevard in the west to Montague Expressway in the east. In the project vicinity, Trimble Road is a six-lane divided roadway with buffered bike lanes on both sides of the street. Sidewalks are intermittent on both sides of the street in the project vicinity. The posted speed limit is 45 mph. Access to and from the Site is provided via Zanker Road.

Bicycle and Pedestrian Facilities

There are several bike paths and several roadways with striped bike lanes in the vicinity of the CABGF/CADC Site. Bicycle facilities are divided into four classes of relative significance. Class I bikeways are bike paths that are physically separated from motor vehicles and offer two-way bicycle travel on a separate path. Class II bikeways are striped bike lanes on roadways that are marked by signage and pavement markings. Class III bikeways are bike routes and only have signs and/or Sharrows (shared lane markings) to help guide bicyclists on recommended routes to certain locations. Class IV bikeways are on-street bicycle facilities that incorporate physical barriers (e.g., raised curbs, flexible bollards, vehicle parking, grade separation, etc.) to separate bicycles from the flow of vehicular traffic. There are no Class III or IV bikeways in the Project vicinity. There are Class I shared use paths and Class II bike lanes.

The Class I bikeway is the Guadalupe River Trail, which extends from the San Francisco Bay to the City's downtown. The closest trail access is provided on Trimble Road, approximately 1.25 miles west from the CABGF/CADC site.

The Class II bikeways are present on the following roadway segments:

- Charcot Avenue, east of Zanker Road
- First Street, north of Brokaw Road (buffered intermittently)
- Zanker Road, between Bering Drive and Old Bayshore Highway
- Brokaw Road, in its entirety
- Airport Parkway, in its entirety
- Charcot Avenue, between Orchard Parkway and Zanker Road
- Trimble Road, in its entirety
- Orchard Parkway, in its entirety
- Plumeria Drive, in its entirety
- Zanker Road, between Bering Drive and SR-237
- Old Bayshore Highway, in its entirety
- Oakland Road, north of Gish Road
- Technology Drive, north of Skyport Drive
- Skyport Drive, east of Technology Drive
- Metro Drive, in its entirety

Pedestrian facilities in the Project area consist of sidewalks and crosswalks with pedestrian signal heads at the signalized intersections. Intermittent sidewalks are provided along Zanker Road, Charcot Avenue, and Brokaw Road. Crosswalks with pedestrian signal heads and push buttons are located at all signalized intersections. Curb ramps with truncated domes are provided at most intersections in the project vicinity; however, some or all curb ramps are missing at the

intersections of Zanker Road/Charcot Road (northeast and southeast corners) and Zanker Road/Brokaw Road.

Transit Services

Existing transit services to the Project area are provided by the buses and LRT from VTA.

The CABGF/CADC site is served by VTA Frequent Route 60. Route 60 travels along Brokaw Road and provides service between the Milpitas BART Station and Winchester Station. Route 60 operates seven days a week with approximately 15-minute headways during the peak commute periods. The nearest Route 60 stop to the Site is located at Brokaw Road and Junction Avenue, approximately 0.25-mile southeast of the Site.

VTA LRT operates two lines in the project vicinity, running within the median of First Street.

VTA Blue Line operates between Baypointe Station in north San José and Santa Teresa Station in south San José. The Blue Line operates with an approximately 15-minute headway during the peak commute periods. The nearest Blue Line stops to the Site are Component Station and Karina Station, located approximately 0.5-mile west of the Site.

VTA Green Line operates between Old Ironsides Station in Santa Clara and Winchester Station in south San José. The Green Line operates with an approximately 15-minute headway during the peak commute periods. The nearest Green Line stops to the Site are Component Station and Karina Station, located approximately 0.5-mile west of the Site.

4.17.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
Would the project result in a cumulatively considerable contribution to a cumulatively significant transportation impact?	☐	☐	☒	☐

Note that the Trimble Substation Expansion and PG&E transmission lines would not generate any new operational traffic trips (only maintenance trips). Only the CABGF/CADC would generate trips. Therefore, these electrical infrastructure developments are not discussed further in the following impact analysis.

4.17.2.1 *Project Impacts*

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?

Transit Facilities

Although data centers are a low employment use, the proposed CABGF/CADC would bring new jobs to the area and could increase the use of transit facilities in the area, including the VTA Frequent Route 60 and LRT Component Station and Karina Station. The General Plan EIR concluded that upon implementation of the General Plan, transit ridership throughout the City would increase. The construction of the CABGF/CADC would encourage the use of transit facilities by bringing new jobs to a Planned Growth Area of the City with accessible local and regional transit connections, and by including measures to reduce vehicle trips to and from the site (refer to PDM TRN-1, below). While the proposed CABGF/CADC would not generate many transit riders, any increased transit demand could be accommodated by the currently available ridership capacity for VTA. Additionally, the CABGF/CADC would not remove, or inhibit access to, any public transit facilities. For these reasons, the proposed CABGF/CADC would not conflict with a program, plan, ordinance, or policy regarding transit facilities. **(Less than Significant Impact)**

Bicycle and Pedestrian Facilities

The proposed CABGF/CADC would result in the construction of a data center building, backup generating facility, and other associated infrastructure to support the operation of a data center. The CABGF/CADC would be in proximity to the Guadalupe River Trail (which can be used by cyclists and pedestrians) and Class II bikeways on Brokaw Road, Charcot Avenue, Trimble Road, and Zanker Road. The proposed CABGF/CADC would not remove, or inhibit access to, any existing or planned bicycle facilities.

The CABGF/CADC would include pedestrian pathways that would connect to existing sidewalks along the frontage. The CABGF/CADC would not inhibit pedestrian flow through the area by reducing sidewalk width or eliminating sidewalks to accommodate vehicular travel. The proposed Project would not conflict with a program, plan, ordinance or policy regarding bicycle and/or pedestrian facilities. **(Less than Significant Impact)**

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

As described in Section 4.17.1.1 Regulatory Framework, the City's adopted Transportation Policy (City Council Policy 5-1) sets forth the thresholds of significance and methodology for analyzing the VMT impacts of development projects. The methodology used to determine existing and project VMT and the analysis of the CABGF/CADC VMT impacts are described below.

VMT Evaluation Methodology

The effects of the proposed CABGF/CADC on VMT were evaluated using the methodology outlined in the City's Transportation Analysis Handbook. VMT is the total miles of travel by personal motorized vehicles a project is expected to generate in a day. Typically, development projects that are farther from other, complementary land uses (such as a business park far from housing) and in areas without transit or active transportation infrastructure (bike lanes, sidewalks, etc.) generate more driving than development near complementary land uses with more robust transportation options. Therefore, developments located in a central business district or planned growth area with high density and diversity of complementary land uses and frequent transit services are expected to internalize trips and generate shorter and fewer vehicle trips than developments located in a suburban area with low density of residential developments and no transit service in the project vicinity. When assessing an office or industrial project, the project's VMT is divided by the number of employees.

The City of San José's Transportation Policy establishes procedures for determining project impacts on VMT based on project description, characteristics, and/or location. The City's Transportation Policy establishes screening criteria for various land uses; projects which meet the screening criteria would not require a detailed, quantitative assessment of VMT. The City's screening criteria for an industrial project is 30,000 square feet of total gross floor area or less. The Project would result in the construction of an approximately 514,000 square foot data center building, which would generate traffic equivalent to approximately 106,000 square feet of industrial space. Therefore, the proposed CABGF/CADC would exceed the screening criterion and a VMT analysis prepared according to the City's Transportation Policy is required.

VMT Evaluation Tool

To determine whether a project would result in transportation impacts related to VMT, the City has developed the San José VMT Evaluation Tool to streamline the analysis for development projects. Based on the APN of a project, the VMT Evaluation Tool identifies the existing average VMT per capita and employee for the project area. Using the following information, the VMT evaluation tool calculates the project generated VMT: project location, type of development, project description, and proposed trip reduction measures.

Projects located in areas where the existing VMT is greater than the established threshold are referred to as being "high-VMT areas." Projects in high-VMT areas are required to include a set of VMT reduction measures that would reduce the project VMT to the greatest extent possible. The VMT evaluation tool evaluates a list of selected VMT reduction measures that can be applied to a project to reduce the project VMT. There are four strategy tiers whose effects on VMT can be calculated with the VMT evaluation tool:

1. Project characteristics (e.g., density, diversity of uses, design, and affordability of housing) that encourage walking, biking and transit uses;
2. Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians;
3. Parking measures that discourage personal motorized vehicle-trips; and
4. Transportation demand management (TDM) measures that provide incentives and services to encourage alternatives to personal motorized vehicle-trips.

Thresholds of Significance

The thresholds of significance for employment uses set forth in the Transportation Analysis Policy are based on the existing regional average VMT per employee. The existing regional average VMT level for industrial employment uses is 16.53 VMT per employee. Projects which exceed this VMT level would result in a significant VMT impact pursuant with the City's policy.

Project-Level VMT Analysis

Based on the results of the VMT Evaluation tool, the VMT generated from the CABGF/CADC would be 17.07 VMT per employee, which would exceed the threshold of 16.53 VMT per employee. The following measure is included in the project as an Applicant Proposed PDM to reduce VMT to an acceptable level.

PDM TRN-1: The Project would exceed the industrial VMT employee threshold of 16.53 VMT per employee. Therefore, the Project shall be required to implement the following improvements:

- **Physical Multi-Modal Improvements**. Prior to the issuance of building occupancy permits, the Project Applicant shall implement

the following multi-modal improvements to incentivize alternative modes of travel and reduce VMT for the Project Site.

- Pedestrian network improvements: Fund pedestrian network improvements on a General Plan-designated City Connector located within and beyond 1 mile of the project's frontage. This multimodal infrastructure mitigation measure requires coordination with City staff. City staff will ultimately determine whether there are any appropriate pedestrian network improvements in the project vicinity. Potential improvements to provide pedestrian network improvements could include reconstruction and/or construction of sidewalks not on the project frontage and removing pork-chop islands not on the project corner at the intersection of Zanker Road/Charcot Avenue.
- Transit accessibility improvements: Fund improvements on surface streets to improve access to transit from the project site. This multimodal infrastructure mitigation measure requires coordination with City staff and/or VTA. City staff and/or VTA will ultimately determine whether there are any appropriate pedestrian network improvements in the project vicinity. Potential improvements to increase transit accessibility could include constructing connecting sidewalks/walkways to/from the transit station.

The multi-modal infrastructure improvements shall be part of a Public Improvement Plan that demonstrates how the multi-modal improvements will be implemented and the schedules for completing the improvements. The Public Improvement Plan shall be reviewed and approved by the Director of Public Works or the Director's designee. The implementation of the multi-modal improvements shall be verified by the Director of Public Works or the Director's designee prior to the issuance of building occupancy permits.

Implementation of the physical multi-modal improvements described above in PDM TRN-1 would reduce the number trips by Project employees and reduce Project VMT generated to 16.28 per employee, which does not exceed the significance threshold of 16.53 per employee. **(Less than Significant Impact)**

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Geometric Design

Site Access

Vehicular access to the project site would be provided via a full access gated driveway along Zanker Road. An emergency-only driveway is shown along Charcot Avenue. The driveway along Zanker Road would be 40 feet wide, which exceeds the City of San Jose Department of Transportation Geometric Design Guidelines requirement of 32 feet wide. Therefore, the proposed driveway would provide adequate access and width for two-way vehicular operations and trucks (such as a WB-67 truck with trailer). The emergency-only driveway along Charcot Avenue would be 26 feet wide and provide adequate access for emergency vehicles.

In addition, the gated driveway along Zanker Road would not result in queuing issues along Zanker Road or on-site since the driveway will provide approximately 180 feet of stacking space. Therefore, vehicles accessing and leaving the site from the CABGF/CADC gated driveway would not have operational issues on Zanker Road.

Sight Distance

Adequate sight distance allows existing vehicles to see pedestrians on the sidewalk, bicycles within the bike lane, and other vehicles traveling on Zanker Road. The minimum acceptable sight distance is typically based on American Association of State Highway and Transportation Officials (AASHTO) stopping sight distance, which varies depending on roadway speeds. Zanker Road has a posted speed limit of 45 miles per hour; therefore, the stopping sight distance at the gated Zanker Road driveway should be 360 feet. In other words, a driver exiting/entering the proposed project driveway on Zanker Road must be able to see 360 feet in the direction with the conflicting movements.

Based on the site plans and field observations, drivers exiting the project driveway along Zanker Road would be able to see more than 360 feet in either direction. This is also an adequate sight distance for trucks entering and existing from this driveway. Therefore, adequate stopping sight distance would be provided. To ensure sight distance is not obstructed from this driveway, PDM TRN-2 below is proposed by the Applicant.

PDM TRN-2: **Sight Distance.** The project driveway along Zanker Road shall be free and clear of obstructions to ensure a minimum clear sight distance of 360 feet. Red curb shall be striped along both sides of the Zanker Road driveway. A site plan showing the red curb striping shall be submitted to the Director of Planning, Building and Code Enforcement or the Director's designee for review and approval prior to issuance of the Special Use Permit for the data center.

On-Site Circulation

To provide adequate on-site circulation for all vehicle types, including larger emergency vehicles and garbage trucks, the design of all internal roadways shall adhere to the City of San José design standards and guidelines. The design of the CABGF/CADC Site must include adequate corner radii along all internal roadways/drive aisles, as well as driveway width, drive aisle width, parking dimensions, and signage that satisfies the design standards. By designing the site in accordance with the City's design standards and guidelines, the project would not substantially increase hazards related to on-site vehicular circulation. As described in the Transportation Analysis, the on-site circulation would be adequate for passenger vehicles and large trucks. All drive aisles measure at least 26 feet in width, which meets City's requirements for minimum widths of 24 feet and provide adequate space for parked vehicles to back out into drive aisles. For these reasons, there would be no significant impacts related to on-site circulation.

Land Use Compatibility

The CABGF/CADC would be located in an area of San José that is developed with similar land uses. The CABGF/CADC Site is located immediately adjacent to existing industrial/commercial uses in all directions. None of the adjacent uses would preclude the proposed data center use on the site, and the proximity of the CABGF/CADC to these land uses would not result in substantial hazards. Therefore, the Project would not result in a significant impact due to land use incompatibilities. **(Less than Significant Impact)**

d) Would the project result in inadequate emergency access?

Emergency access to the site would be provided by the Charcot Avenue driveway. This driveway would be 26 feet wide, which is a wide enough drive aisle to accommodate emergency vehicles. The CABGF/CADC would also be required to comply with the applicable City of San José policies and ordinances requiring adequate emergency access for the CABGF/CADC Site. For these reasons, the proposed Project would not interfere with the emergency response to the CABGF/CADC Site. Therefore, the proposed Project would result in a less than significant impact to emergency access to and around the CABGF/CADC Site. **(Less than Significant Impact)**

4.17.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant transportation impact?

Projects must demonstrate consistency with the Envision San José 2040 General Plan to address cumulative impacts. Consistency with the City's General Plan is based on the project's density, design, and conformance to the General Plan goals and policies. If a project is determined to be

inconsistent with the General Plan, a cumulative impact analysis is required per the City's Transportation Analysis Handbook.

The Transportation Analysis determined that the Project is consistent with the applicable General Plan goals and policies. The Project would be consistent with the zoning districts in which the Project Component Sites are located, and the proposed employment density would be consistent with the General Plan Land Use designation for the Sites. The Project also incorporates a PDM TRN-1 to reduce project-generated VMT below the City's threshold of significance. Therefore, the proposed Project would not result in a cumulatively considerable contribution to a significant cumulative impact. **(Less than Significant Cumulative Impact)**

4.18 Tribal Cultural Resources

The discussion in this section is based in part on Cultural Resources Reports (CRR) prepared for the CABGF/CADC Site (May 2026) and Trimble Substation Expansion Site and PG&E Transmission Line Routes (August 2026) by Chronicle Heritage. Copies of these report will be docketed with the Commission under a Request for Confidentiality. In this report mitigation measures are recommended to reduce impacts. The Applicant has incorporated these recommendations into PDMs as discussed below.

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

State

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
    - Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
    - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

4.18.1.2 *Existing Conditions*

Native Americans occupied Santa Clara Valley and the greater Bay Area for more than 5,000 years. The exact time period of the Ohlone (originally referred to as Costanoan) migration into the Bay Area is debated by scholars. Dates of the migration range between 3000 B.C. and 500 A.D. Regardless of the actual time frame of their initial occupation of the Bay Area and, in particular, Santa Clara Valley, it is known that the Ohlone had a well-established population of approximately

7,000 to 11,000 people with a territory that ranged from the San Francisco Peninsula and the East Bay, south through the Santa Clara Valley and down to Monterey and San Juan Bautista.

The Ohlone people were hunter/gatherers focused on hunting, fishing, and collecting seasonal plant and animal resources, including tidal and marine resources from San Francisco Bay. The customary way of living, or lifeway, of the Costanoan/Ohlone people disappeared by about 1810 due to disruption by introduced diseases, a declining birth rate, and the impact of the California mission system established by the Spanish in the area beginning in 1777.

Database Searches

As described in Section 4.5 Cultural Resources, an archaeological literature searches were prepared for the Project Component Sites to identify any potential cultural resources present on-site or in adjacent areas. The literature search did not identify any cultural resources within the Project Component Sites.

The NAHC responded to Sacred Lands File requests on April 7, 2026 and July 6, 2026 stating that the search results were positive, meaning a tribe has reported the presence of sacred lands within the NAHC search radius.

Native American Outreach

AB 52 requires lead agencies to complete formal consultations with California Native American tribes during the CEQA process to identify tribal cultural resources that may be subject to significant impacts by a project. Where a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact. This consultation requirement applies only if the tribes have sent written requests for notification of projects to the lead agency. Chronicle Heritage, the Project's qualified archaeologists, notified Tribes of the Project in letters on April 8, 2026 and July 6, 2026. The following list summarizes the correspondences received during this outreach process:

- On April 8, 2026, President Emeritus Andy Galvan of the Ohlone Indian Tribe requested a copy of the SLF results. The SLF results were sent to the tribe on April 9, 2026 and a subsequent virtual meeting with the tribe was held on April 22, 2026.[175]
- On April 9, 2026, Bernadette Quiroz of the Muwekma Ohlone Tribe responded requesting formal Tribal consultation on the Project.
- On July 15, 2026, Jon Kunkel of the Confederated Villages of Lisjan Nation responded stating the Project area does not fall within their traditional territory and defers to Tribal Chairwoman Quirina Geary of the Tamien Nation.

[175] The purpose of this meeting was to provide the Tribe with information regarding the project and was not part of a formal Tribal consultation process.

- On July 20, 2026, Bernadette Quiroz of the Muwekma Ohlone Tribe responded requesting formal Tribal consultation on the Project.

It is assumed in this SPPE Application that the Commission, as the Lead Agency, will conduct Tribal Consultation pursuant to the requirements of AB 52 during the EIR preparation process.

4.18.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐
Would the project result in a cumulatively considerable contribution to a significant cumulative tribal cultural resources impact?	☐	☐	☒	☐

4.18.2.1 *Project Impacts*

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

While there are no known tribal cultural resources on the Project Component Sites that are listed or eligible for listing in the NRHP or CRHR, the NAHC Sacred Lands File record search results were positive and the Sites have moderate to high sensitivity for archaeological resources (including tribal cultural resources). Therefore, Project activities (particularly grading, trenching, and/or excavating) could damage as-yet unrecorded subsurface resources, including tribal resources. Undiscovered tribal resources at the Sites could potentially be eligible for listing in local or statewide registers of historical resources. Accordingly, an appropriate process must be followed during site development which would ensure that any resources that are uncovered are properly accounted for and preserved for study.

As identified in Section 4.5 Cultural Resources, the CABGF/CADC and Trimble Substation Expansion Sites would implement PDM CUL-1.1 through PDM CUL-1.3 which would require an archaeological and Native American monitor be present on-site during ground-disturbance of native soils and implementation of appropriate treatment measures should any resources by discovered. The PG&E transmission line would be covered under PG&E's O&M FEIR and implement PG&E Programmatic Measures CR-1, CR-2, CR-3, CR-4, and CR-5 (refer to Table 4.5-1).

With implementation of the above PDMs and PG&E programmatic measures, the proposed Project would have a less than significant impact on tribal cultural resources. **(Less than Significant Impact)**

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

As discussed above under checklist question a), the Project Component Sites have moderate to high sensitivity for buried Native American archaeological deposits and buried archaeological deposits. No specific tribal cultural resources were identified during the outreach process or pedestrian surveys of the Site. With the implementation of PDMs CUL-1.1, CUL-1.2, CUL-1.3, CUL-1.4, and CUL-2, and PG&E Programmatic Measures CR-1, CR-2, CR-3, CR-4, and CR-5, the proposed Project would not result in substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 **(Less than Significant Impact)**

4.18.2.2 *Cumulative Impact*

Would the project result in a cumulatively considerable contribution to a significant cumulative tribal cultural resources impact?

The geographic study area for cumulative impacts to TCRs is the surrounding area (within 1,000 feet of the Project Components Sites). No tribal cultural features, including sites, features, places, cultural landscapes or sacred places have been identified at the site based on available information. However, the Project Component Sites have moderate to high potential for discovering cultural resources, which includes TCRs. With PDMs CUL-1.1, CUL-1.2, CUL-1.3, and CUL-2, along with PG&E's programmatic measures, any unanticipated TCRs finds would be handled properly by a qualified archaeologist and Native American tribe. As a result, the Project would have a less than significant cumulative impact on TCRs. **(Less than Significant Cumulative Impact)**

4.19 Utilities and Service Systems

4.19.1 Environmental Setting

4.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of the UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The City of San José Municipal Water adopted its most recent UWMP in June 2021.[176]

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the California Integrated Waste Management Board (CIWMB), required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels) by 2000 and thereafter. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program. Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle.

Senate Bill 610

SB 610 amended state law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 requires preparation of a Water Supply Assessment (WSA) containing detailed information regarding water availability to be provided to the decision-makers prior to approval of specified large development projects that also require a General Plan Amendment. This WSA must be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county (or other lead agency) on such projects. Under SB 610, WSAs must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to

[176] City of San José. *2020 Urban Water Management Plan.* June 2021.

CEQA. Pursuant to the California Water Code (Section 10912[a]), projects that require a WSA include any of the following:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- A mixed-use project that includes one or more of the projects identified in this list; or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

Assembly Bill 1826

AB 1826 sets forth the requirements of the statewide mandatory commercial organics recycling program for businesses and multi-family dwellings with five or more units that generate two or more cubic yards of commercial solid waste per week. AB 1826 sets a statewide goal for 50 percent reduction in organic waste disposal by the year 2020.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025. CalRecycle released an analysis titled "Analysis of the Progress Toward the SB 1383 Organic Wase Reduction Goals" in August 2020 (revised November 2020), which recommended maintaining the disposal reduction targets set forth in SB 1383.[177]

California Green Building Standards Code Compliance for Construction, Waste Reduction, Disposal and Recycling

In January 2023, the State of California adopted the most recent version of the CALGreen, establishing mandatory green building standards for all new and qualifying remodeled structures in California. CALGreen covers five categories: planning and design, energy efficiency, water efficiency

[177] CalRecycle. "Analysis of the Progress Toward the SB 1383 Organic Wase Reduction Goals (DRRR-2020-1693)." Accessed May 22, 2024. https://www2.calrecycle.ca.gov/Publications/Details/1693.

and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Providing readily accessible areas for recycling by occupants.

Local

Envision San José 2040 General Plan

The General Plan contains the following policies which are specific to utilities and service systems and applicable to the proposed project:

Policy	Description
IN-3.3	Meet the water supply, sanitary sewer and storm drainage level of service objectives through an orderly process of ensuring that, before development occurs, there is adequate capacity. Coordinate with water and sewer providers to prioritize service needs for approved affordable housing projects.
IN-3.5	Require development which will have the potential to reduce downstream LOS to lower than "D", or development which would be served by downstream lines already operating at a LOS lower than "D", to provide mitigation measures to improve the LOS to "D" or better, either acting independently or jointly with other developments in the same area or in coordination with the City's Sanitary Sewer Capital Improvement Program.
IN-3.7	Design new projects to minimize potential damage due to stormwaters and flooding to the site and other properties.
IN-3.9	Require developers to prepare drainage plans that define needed drainage improvements for proposed developments per City standards.
MS-3.1	Require water-efficient landscaping, which conforms to the State's Model Water Efficient Landscape Ordinance, for all new commercial, institutional, industrial, and developer-installed residential development unless for recreation needs or other area functions.
MS-3.2	Promote use of green building technology or techniques that can help to reduce the depletion of the City's potable water supply as building codes permit.
MS-3.3	Promote the use of drought tolerant plants and landscaping materials for nonresidential and residential uses.
IN-3.10	Incorporate appropriate stormwater treatment measures in development projects to achieve stormwater quality and quantity standards and objectives in compliance with the City's National Pollutant Discharge Elimination System (NPDES) permit.
EC-5.16	Implement the Post-Construction Urban Runoff Management requirements of the City's Municipal NPDES Permit to reduce urban runoff from project sites.

In addition to the above-listed San José General Plan policies, new development in San José is also required to comply with programs that mandate the use of water-conserving features and appliances and the Santa Clara County Integrated Watershed Management (IWM) Program, which minimizes solid waste.

San José Zero Waste Strategic Plan/Climate Smart San José

Climate Smart San José provides a comprehensive approach to achieving sustainability through new technology and innovation. The Zero Waste Strategic Plan outlines policies to help the City of San José foster a healthier community and achieve its Climate Smart San José goals, including 75 percent diversion of waste from the landfill by 2013 and zero waste by 2022. The Climate Smart San José also includes ambitious goals for economic growth, environmental sustainability, and enhanced quality of life for San José residents and businesses.

San José Sewer System Management Plan

The purpose of the Sewer System Management Plan (SSMP) is to provide guidance to the City in the operation, maintenance, and rehabilitation of the sewer assets of the City of San José. The SSMP includes construction standards and specifications for the installation and repair of the collection system and its associated infrastructure.

Private Sector Green Building Policy

The City of San José's Green Building Policy for new private sector construction encourages building owners, architects, developers, and contractors to incorporate meaningful sustainable building goals early in the design process. This policy establishes baseline green building standards for private sector construction and provides a framework for the implementation of these standards. It is also intended to enhance the public health, safety, and welfare of San José residents, workers, and visitors by fostering practices in the design, construction, and maintenance of buildings that will minimize the use and waste of energy, water, and other resources.

San José Construction and Demolition Diversion Deposit Program

The Construction and Demolition Diversion Deposit Program (CDDD) requires projects to divert at least 50 percent of total projected project waste to be refunded the deposit. Permit holders pay this fully refundable deposit upon application for the construction permit with the City if the project is a demolition, alteration, renovation, or a certain type of tenant improvement. The minimum project valuation for a deposit is $2,000 for an alteration-renovation residential project and $5,000 for a non-residential project. There is no minimum valuation for a demolition project and no square footage limit for the deposit applicability. The deposit is fully refundable if construction and demolition materials were reused, donated, or recycled at a City-certified processing facility. Reuse and donation require acceptable documentation, such as photos, estimated weight quantities, and receipts from donations centers stating materials and quantities.

California Green Building Standards Code Compliance for Construction, Waste Reduction, Disposal and Recycling

The City of San José requires 75 percent diversion of nonhazardous construction and demolition debris for projects that qualify under CALGreen, which is more stringent than the state requirement of 65 percent (San José Municipal Code Section 9.10.2480).

4.19.1.2 *Existing Conditions*

Water Services

Water service to the Project area is provided by the San José Water Company (SJW) from a combination of groundwater, surface water purchased through the Santa Clara Valley Water District, and treated surface water from our local water supply. SJW provides water to approximately one million residents in Santa Clara County through about 231,000 service connections.[178] In addition to its own water system, SJW also operates, maintains, and improves the Cupertino Municipal Water System through a lease agreement. Combined, the SJW and City of Cupertino water systems consist of approximately 2,450 miles of pipelines, 100 pressure zones, 225 booster pumps, 92 wells, 110 tanks and reservoirs, 11 raw water intakes, 5 raw water impoundments, 3 water treatment plants, and tens of thousands of other assets including valves, meters, service lines, fire hydrants, and chemical systems.[179] In 2020, SJW's water demand was 39,592 million gallons.[180]

The Project Component Sites consist of developed and undeveloped parcels, public right-of-way along existing roads, and PG&E easements. As discussed in Section 3.5.8.1, the CABGF/CADC Site is served by existing water mains on Charcot Avenue and Zanker Road and an existing recycled water main on Charcot Avenue. The Trimble Substation Expansion Site is served by existing water lines located in Component Drive and N. First Street. The existing uses on the CABGF/CADC Site are estimated to use approximately 190,743 gallons per day (gpd) of water.[181] The Trimble Substation Expansion Site is currently undeveloped and does not use any water.

Sanitary Sewer/Wastewater Treatment

Wastewater from the City is treated at the San José/ Santa Clara Regional Wastewater Facility (Facility), which is administered and operated by the City's Department of Environmental Services. The Facility provides primary, secondary, and tertiary treatment of wastewater and has the capacity to treat 167 million gallons per day of wastewater. The Facility treats an average of approximately

[178] San José Water Company. *2020 Urban Water Management Plan*. June 2021. Page 3-1.
[179] Ibid.
[180] Ibid. Page 4-2.
[181] Using a rate of 231,250 gallons per year per 1,000 square feet. 301,064 square feet of industrial building/1,000 square feet = 301 square feet. 301 square feet * 231,250 gallons per year/365 days = 190,743 gallons per day. Source: California Air Pollution Officers Association. "California Emissions Estimator Model (CalEEMod) User Guide Version 2022.1, Appendix G, Default Data Tables." April 2022. G-31. Accessed June 10, 2026. https://www.caleemod.com/user-guide.

84 millions of gallons per day of wastewater and serves 1.4 million residents and 17,000 businesses in eight cities and four sanitation districts.[182] The Facility has the capacity to treat 167 million gallons of wastewater per day (mgd) during dry weather flow, with the City allocated 108.6 mgd of existing capacity. [183] The City of San José generates approximately 69.8 mgd of dry weather average flow, leaving 38.8 of excess treatment capacity at the Facility for the City's wastewater treatment demands.[184] The Facility is currently operating under a 120-mgd weather effluent flow constraint and, in 2022, the average dry weather effluent flow was 60.6 mgd.[185]

As described in Section 3.5.8.2 Sanitary Sewer Infrastructure, the CABGF and CADC Site will connect to an existing 15-inch sanitary sewer main in Charcot Avenue and an eight-inch sanitary sewer main in Zanker Road. The existing uses on the CABGF/CADC Site currently generate approximately 152,594 gpd of wastewater.[186] The Trimble Substation Expansion Site is currently undeveloped and does not generate any wastewater.

Storm Drainage

The City of San José owns and maintains the municipal stormwater drainage system which serves the Project Component Sites. The Project Component Sites are located within an urbanized area served by an existing storm drainage system. Surface runoff from the CABGF/CADC Site storm drains discharge into the City's storm drain system, which carries runoff into the Coyote Watershed and eventually into the San Francisco Bay. Surface runoff from the Trimble Substation Expansion Site infiltrates directly into the ground. As discussed in section 3.5.7 Stormwater Controls and Features, the CABGF/CADC Site is fully developed land with two storm drain laterals along Charcot Avenue that serve the existing site. There is also a 42-inch diameter public storm drain line that crosses west-east through the site within a 15 foot-wide storm drain easement. The Trimble Substation Expansion Site is undeveloped and currently does not have any stormwater infrastructure.

Solid Waste

The City of San José generates approximately 1.7 million tons of solid waste annually.[187] Most of that waste (approximately 60 percent) is diverted and disposed of at recycling facilities and composting facilities. Solid waste generated within the City is transported to Guadalupe Mines, Kirby Canyon, Newby Island, and Zanker Road landfills. The City has an existing contract with Newby

[182] City of San José. "San José-Santa Clara Regional Wastewater Facility." Accessed March 12, 2026. https://www.sanjoseca.gov/your-government/departments-offices/environmental-services/water-utilities/regional-wastewater-facility.
[183] San José-Santa Clara Regional Wastewater Facility. "2022 Annual Pollution Prevention Report." August 2020. Page 4. Accessed March 12, 2026. https://www.sanjoseca.gov/home/showpublisheddocument/99424/638224377363630000
[184] City of San José. *Integrated Final Program Environmental Impact Report for the Envision San José 2040 General Plan. SCH# 2009072096.* September 2011. Page 648.
[185] San José-Santa Clara Regional Wastewater Facility. "2022 Annual Self-Monitoring Report." Page 5. Accessed March 12, 2026. https://www.sanjoseca.gov/home/showpublisheddocument/94789/638124181781530000.
[186] Wastewater is estimated to be 80 percent of water use.
[187] City of San José. *Envision San José 2040 General Plan Integrated Final Program Environmental Impact Report*. SCH: 2009072096. September 2011. Page 650.

Island Sanitary Landfill (NISL). The NISL has approximately 10.1 million cubic yards (10,139,931 cubic yards) of disposal capacity remaining and an estimated closure date of 2035.[188] The City has an annual disposal allocation for 395,000 tons per year. The existing uses on the CABGF/CADC Site generate approximately 373 tons of solid waste per year.[189] The Trimble Substation Expansion Site is undeveloped and currently does not generate any solid waste.

4.19.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
Would the project result in a cumulatively considerable contribution to a cumulatively significant utilities and service systems impact?	☐	☐	☒	☐

[188] Boccaleoni, Anthony. Republic Services. Personal Communication. May 30, 2025.
[189] Using a rate of 1.24 tons per year per 1,000 square feet. 301,064 square feet of industrial building/1,000 square feet = 301 square feet. 301 square feet * 1.24 tons per year = 373 tons per day. Source: California Air Pollution Officers Association. "California Emissions Estimator Model (CalEEMod) User Guide Version 2022.1, Appendix G, Default Data Tables." April 2022. G-36. Accessed June 10, 2026. https://www.caleemod.com/user-guide.

4.19.2.1 *Project Impacts*

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water Facilities

CABGF/CADC

Potable Water

The CABGF/CADC would connect to the water main on Charcot Avenue with a two-inch lateral for potable water services and two, 12-inch laterals for fire services. The CABGF/CADC would not require the construction or expansion of potable water delivery systems or the expansion of the boundaries of the SJW service area. The construction of the new water laterals would be subject to the PDMs identified in this SPPE Application. Therefore, the CABGF/CADC would not result in significant environmental effects related to the relocation or construction of new or expanded potable water facilities.

Recycled Water

The CABGF/CADC would connect to the existing recycled water main in Charcot Avenue for irrigation services. The CABGF/CADC would not require the construction or expansion of recycled water delivery systems or the expansion of the boundaries of the recycled water service area. The construction of the new recycled water laterals would be subject to the PDMs identified in this SPPE Application. Therefore, the CABGF/CADC would not result in significant environmental effects related to the relocation or construction of new or expanded recycled water facilities.

Wastewater Treatment Facilities

The CABGF/CADC would connect to the City's existing sanitary sewer system. As mentioned in Section 3.5.8.2 Sanitary Sewer Infrastructure, the CABGF/CADC will connect to an existing 15-inch sewer main in Charcot Avenue and an eight-inch sewer main in Zanker Road. The construction of new sewer lines would be subject to the PDMs identified in this SPPE Application. Therefore, the Project would not result in significant environmental effects related to the relocation or construction of new or expanded wastewater and sanitary sewer facilities.

Stormwater Drainage Facilities

As discussed in Section 4.10 Hydrology and Water Quality, the Project would result in a decrease of 137,577 square feet of impervious surfaces at the CABGF/CADC Site. The CABGF/CADC would be required to comply with the MRP and City of San José Policy 6-29, which would remove pollutants

and reduce the rate and volume of runoff from the Site to levels that are at or below existing conditions. As described under Section 3.5.7, the Project would include the construction of LID bioretention areas totaling approximately 15,300 square feet. These stormwater treatments would promote on-site infiltration and reduce stormwater runoff on-site. The proposed storm drainage improvements would occur during grading and would be required to implement the PDMs identified in this SPPE Application.

Trimble Substation Expansion and PG&E Transmission Lines

Potable and Recycled Water

The proposed Trimble Substation Expansion would not require potable or recycled water as the facility would be unmanned and no irrigated landscaping is proposed. The PG&E transmission lines would be located within the public right-of-way along existing roads and would not require potable water.

Wastewater Treatment Facilities

The proposed Trimble Substation Expansion would not require sanitary sewer connections as the facility would be unmanned. The PG&E transmission lines would be located within the public right-of-way along existing roads and would not require wastewater treatment.

Stormwater Drainage Facilities

PG&E would be required to comply with Provision C.3 of the MRP for the proposed Trimble Substation Expansion. The PG&E transmission line will not result in significant water quality impacts post construction. The transmission lines will be either underground or overhead and will be located entirely within the public right of way.

Electric Power, Natural Gas, and Telecommunication Facilities

As discussed in Section 3.5.4 PG&E Trimble Substation Expansion and Transmission and IT Communication Lines, the Project would expand the existing Trimble Substation. The proposed Trimble Substation Expansion will be designed and constructed in accordance with PG&E standards and will be subject to the PDMs identified in this SPPE Application.

PG&E will also construct a new transmission line to connect the expanded substation to the Project substation. The potential PG&E transmission line routes are primarily located within the public right-of-way along Zanker Road, Charcot Avenue, Component Drive, N. First Street, and E. Brokaw Road. The environmental impacts of electric infrastructure improvements are included the analysis in this SPPE Application. As described throughout this SPPE Application, PG&E would implement PG&E AMMs, BMPs, and programmatic measures to reduce environmental impacts associated with the construction of the transmission lines.

The Project would not connect to the existing natural gas lines because the Project Applicant has proposed that no natural gas infrastructure would be constructed. The Project would tie into existing telecommunication lines and would not require the expansion or construction of new telecommunication facilities.

For these reasons, the Project would not result in significant environmental effects related to the relocation or construction of new or expanded electric, natural gas, or telecommunication facilities since the Project would be subject to the PDMs identified in this SPPE Application to reduce environmental impacts. **(Less than Significant Impact)**

b) Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

CABGF/CADC

As described in Section 3.5.2.2, the CABGF/CADC will use air-cooled chillers to remove the heat generated in the data center. The air-cooled chillers will not use water for the cooling process. As shown in Table 3.5-1, the CABGF/CADC will have a potable water demand of approximately 3,661 gpd, which equates to 1,336,192 gallons per year (or 4.09 acre-feet per year). For industrial projects, the CEQA Guidelines define a "Water Demand Project" as an industrial, manufacturing/processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area (or, alternatively, any project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project). The CABGF/CADC would not house more than 1,000 persons, occupy more than 40 acres of land, or have more than 650,000 square feet of floor area. Additionally, the estimated water demand of 1,336,192 gallons per year or 4.09 acre-feet per year would be less than a typical 500 residential dwelling unit project, which is estimated to range from 150 to 250 acre-feet per year.[190] For these reasons, the proposed Project is not considered a "Water Demand Project" under CEQA Guidelines Section 15155. Therefore, it does not require a project-level WSA.

As discussed above, the existing industrial uses on-site use approximately 190,743 gpd of water.[191] Given the CABGF/CADC would generate substantially less water demand than existing uses, the Project would have a less than significant impact on the City's water supply.

[190] Based on 0.3-0.5 acre-feet per year per dwelling unit, multiplied by 500 dwelling units. Source: California Department of Water Resources. Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001. October 8, 2003. Accessed at https://cawaterlibrary.net/wp-content/uploads/2017/06/guidebook.pdf.

[191] Using a rate of 231,250 gallons per year per 1,000 square feet. 301,064 square feet of industrial building/1,000 square feet = 301 square feet. 301 square feet * 231,250 gallons per year/365 days = 190,743 gallons per day. Source: California Air Pollution Officers Association. "California Emissions Estimator Model (CalEEMod) User Guide Version 2022.1, Appendix G, Default Data Tables." April 2022. G-31. Accessed June 10, 2026. https://www.caleemod.com/user-guide.

Trimble Substation Expansion and PG&E Transmission Lines

Neither the Trimble Substation Expansion nor the PG&E transmission lines would use water.

As documented above, sufficient water supplies would be available to serve the proposed Project and reasonably foreseeable future development during normal and dry years. **(Less than Significant Impact)**

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

CABGF/CADC

As shown in Table 3.5-2, the proposed CABGF/CADC would generate approximately 2,196 gpd or 801,570 gallons per year of wastewater. This would be approximately 0.001 percent of the remaining allocation (38.85 millions of gallons per day) of the Facility and 150,398 gpd less than the existing uses.

Trimble Substation Expansion and PG&E Transmission Lines

Neither the Trimble Substation Expansion nor the PG&E transmission lines would generate wastewater.

As documented above, the proposed Project would not represent a significant increase in wastewater above existing commitments and would not impact capacity for a wastewater treatment provider to provide wastewater treatment. **(Less than Significant Impact)**

d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

CABGF/CADC

As discussed in Section 4.19.1.2 Existing Conditions, NISL has approximately 10.1 million cubic yards of capacity remaining. The Project would generate approximately 280 tons[192] of solid waste per year, which represents less than 0.1 percent of the City's annual disposal allocation and 93 tons less solid waste per year than the existing uses on-site. Thus, the Project's solid waste would be

[192] Using a rate of 0.930 tons of solid waste per year per 1,000 square feet. 301,064 square feet of data center building/1,000 square feet = 301 square feet. 301 square feet * 0.930 tons per year = 280 tons of solid waste per year. Source: California Air Pollution Officers Association. "California Emissions Estimator Model (CalEEMod) User Guide Version 2022.1, Appendix G, Default Data Tables." April 2022. G-36. Accessed June 11, 2026. https://www.caleemod.com/user-guide.

accommodated by local landfills. Furthermore, each jurisdiction in Santa Clara County has a landfill diversion requirement of 50 percent per year. According to the latest Five-Year Countywide or Regional Agency Integrated Waste Management Plan, the County has adequate disposal capacity beyond 2030.[193] The Project would be required to conform to City plans and policies and other applicable laws and regulations to reduce solid waste generation and would be served by a landfill with adequate capacity.

Trimble Substation Expansion and PG&E Transmission Lines

The Trimble Substation Expansion and PG&E transmission lines would not generate solid wase.

For these reasons, the proposed Project would not exceed the capacity of existing landfills or solid waste disposal infrastructure, nor would it impair the attainment of solid waste reduction goals. **(Less than Significant Impact)**

e) Would the project be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?

CABGF/CADC

During construction, the CABGF/CADC would be required to provide on-site recycling bins, develop a construction waste management plan, salvage at least 75 percent of nonhazardous construction/demolition debris (by weight), and implement other waste reduction measures as per current CALGreen requirements. While the Project would increase solid waste generation compared to existing conditions, the CABGF/CADC would conform with City's Zero Waste Strategic Plan. Compliance with the local policy would ensure that the proposed Project would not result in significant impacts on solid waste disposal capacity in excess of state or local standards or in excess of NISL remaining capacity.

Trimble Substation Expansion and PG&E Transmission Lines

The Trimble Substation Expansion and PG&E transmission lines would not generate any solid waste once operational.

For the reasons documenta above, the Project would have no impact on federal, state, or local management and reduction statutes and regulations related to solid waste **(Less than Significant Impact)**

[193] Santa Clara County. *Five-Year CIWMP/RAIWMP Review Report.* June 2016.

4.19.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant utilities and service systems impact?

Relocation or Construction of New or Expanded Facilities

The geographic study area for cumulative impacts to utilities and service systems is citywide or within the applicable utility's service area. Except for extensions to existing utility infrastructure located adjacent to the Project Components Sites within existing public rights of way, the Project would not require the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, natural gas, or telecommunications facilities. The Envision San José 2040 General Plan Integrated Final Program EIR (General Plan FEIR) found that buildout of the General Plan would not result in impacts related to water supply, wastewater treatment and storm drainage facilities, or solid waste infrastructure. Any proposed new or expanded facilities necessitated by future cumulative development would be subject to environmental review and is not anticipated to result in significant environmental effects. Cumulative PG&E projects would implement PG&E AMMs, BMPs, and programmatic measures to reduce environmental impacts. Therefore, the Project would not result in cumulatively significant effects on the environment related to the relocation or construction of new or expanded facilities.

Water Supply

The geographic area for cumulative water supply is the service area of SJW. The General Plan FEIR concluded that SJW has sufficient water supply for cumulative development under the General Plan through 2040.[194] During a single dry year or multiple dry years, conservation measures would need to be implemented per SJW's Water Shortage Contingency Plan.[195] Cumulative PG&E projects would have minimal demand for water. For these reasons, there is no significant cumulative water supply impact.

Wastewater Treatment

The geographic area for cumulative wastewater treatment is the service area of the Facility. As discussed under checklist question c), there is sufficient treatment capacity at the Facility for the buildout of the General Plan and the Project. Cumulative PG&E projects would generate minimal wastewater. As such, the Project would not result in a cumulatively significant impact on wastewater treatment facilities.

[194] City of San José. *Integrated Final Program Environmental Impact Report for the Envision San José 2040 General Plan.* SCH# 2009072096. September 2011. Page 664.
[195] Ibid. Page 665.

Solid Waste

The geographic area for cumulative landfill capacity is Santa Clara County. As discussed under checklist question d), the General Plan FEIR determined that the increase in waste generated by build out of the General Plan (which includes the Project and future cumulative projects) would not result in an exceedance of capacity at existing landfills or otherwise impair the attainment of solid waste reduction goals. Cumulative projects in the City would be required to conform to City plans and policies to reduce solid waste generation and increase waste diversion, such as the Zero Waste Strategic Plan and General Plan Policies IN-1.5, IN-5.1, IN-5.3, IN-5.4, and IP-3.8. Cumulative PG&E projects would not generate significant quantities of solid waste. As such, the Project would not result in a cumulatively significant solid waste impact.

All cumulative projects are required to adhere to the requirements of the Zero Waste Strategic Plan and General Plan policies, thereby complying with applicable statutes and regulations related to solid waste, including CALGreen, AB 939, AB 341, and local waste diversion requirements. Therefore, the Project would not result in a cumulatively significant impact due to noncompliance with federal, state, or local management and reduction statues and regulations related to solid waste.

Based on the above, the Project would not result in a cumulatively considerable contribution to a significant cumulative utilities and service systems impact. **(Less than Significant Cumulative Impact)**

4.20 Wildfire

4.20.1 Environmental Setting

4.20.1.1 *Regulatory Framework*

Fire Hazard Severity Zones

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as FHSZs, these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZs are divided into areas where the state has financial responsibility for wildland fire protection, known as state responsibility areas (SRAs), and areas where local governments have financial responsibility for wildland fire protection, known as local responsibility areas (LRAs). Homeowners living in an SRA are responsible for ensuring that their property is in compliance with California's building and fire codes. Only lands zoned for very high fire hazard are identified within LRAs.

California Fire Code Chapter 47

Chapter 47 of the California Fire Code sets requirements for wildland-urban interface fire areas that increase the ability of buildings to resist the intrusion of flame or burning embers being projected by a vegetation fire, in addition to systematically reducing conflagration losses through the use of performance and prescriptive requirements.

California Public Resources Code Section 4442 through 4431

The California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that uses an internal combustion engine; specify requirements for the safe use of gasoline-powered tools on forest-covered land, brush-covered land, or grass-covered land; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (Public Resources Code Section 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period, from April 1 to December 1 (Public Resources Code Section 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain appropriate fire suppression equipment (Public Resources Code Section 4427); and

- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (Public Resources Code Section 4431).

California Public Resources Code Section 4292 through 4293

The California Public Resources Code provides regulations to enhance safety with regard to the operation and management of electrical transmission lines. These include, but are not limited to, the following:

- PRC Section 4292: This section requires the clearing of flammable vegetation around specific structures that support certain connectors or types of electrical apparatus. An approximately 10-foot radius around such structures must remain clear of vegetation for the entirety of the fire season.
- PRC Section 4293: This section requires specific clearance between conductors and vegetation. As the line voltage increases, the clearance radius also increases. In addition, some trees must be removed if they pose the potential to fall on an electrical transmission line and cause damage.

California Code of Regulations Title 14

The California Board of Forestry and Fire Protection has adopted regulations, known as SRA Fire Safe Regulations, which apply basic wildland fire protection standards for building, construction, and development occurring in a SRA. The future design and construction of structures, subdivisions and developments in SRAs are required to provide for the basic emergency access and perimeter wildfire protection measures discussed in Title 14.

Fire Management Plans

CAL FIRE has developed an individual Unit Fire Management Plan for each of its 21 units and six contract counties. CAL FIRE has developed a strategic fire management plan for the Santa Clara Unit, which covers the project area and addresses citizen and firefighter safety, watersheds and water, timber, wildlife and habitat (including rare and endangered species), unique areas (scenic, cultural, and historic), recreation, range, structures, and air quality. The plan includes stakeholder contributions and priorities and identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work with the local fire issues.

Local

Envision 2040 General Plan

The following policies in the City's General Plan have been adopted for the purpose of reducing or avoiding impacts related to wildfire.

Policy	Description
EC-8.1	Minimize development in very high fire hazard zone areas. Plan and construct permitted development so as to reduce exposure to fire hazards and to facilitate fire suppression efforts in the event of a wildfire.
EC-8.2	Avoid actions which increase fire risk, such as increasing public access roads in very high fire hazard areas, because of the great environmental damage and economic loss associated with a large wildfire.
EC-8.3	For development proposed on parcels located within a very high fire hazard severity zone or wildland-urban interface area, implement requirements for building materials and assemblies to provide a reasonable level of exterior wildfire exposure protection in accordance with City-adopted requirements in the California Building Code.

4.20.1.2 *Existing Conditions*

The Project Site is located in an urbanized area of the City of San José. The Project Component Sites are not located in or near a state responsibility area or near lands classified as very high fire hazard severity zones.[196] The nearest State responsibility area is approximately five miles northeast of the CABGF/CADC Site (considered moderate fire hazard zone) and the nearest very high fire hazard severity zone is approximately six miles northeast of the Site, near Ed R. Levin County Park.[197]

4.20.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

[196] California Board of Forestry and Fire Protection. *Fire Hazard Severity Zones Maps*. https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones. Accessed March 11, 2026.
[197] Ibid.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
Would the project result in a cumulatively considerable contribution to a cumulatively significant wildfire impact?	☐	☐	☐	☒

4.20.2.1 *Project Impacts*

The Project Component Sites are not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, the Project would not result in wildfire impacts. **(No Impact)**

4.20.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant wildfire impact?

The Project Component Sites are not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, the Project would not result in cumulative wildfire impacts. **(No Cumulative Impact)**

4.21 Environmental Justice

4.21.1 Environmental Setting

4.21.1.1 *Regulatory Framework*

Federal

Executive Order (EO) 12898 has been rescinded pursuant to EO 14173, and EO 14096 has been rescinded pursuant to EO 14148. There is currently no federal guidance on environmental justice.

State

Pursuant with the California Code, Government Code Section 65040.12 and Public Resources Code Section 72000, the State defines environmental justice as the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies Environmental Justice includes, but is not limited to, all of the following:

> (A) The availability of a healthy environment for all people.
>
> (B) The deterrence, reduction, and elimination of pollution burdens for populations and communities experiencing the adverse effects of that pollution, so that the effects of the pollution are not disproportionately borne by those populations and communities.
>
> (C) Governmental entities engaging and providing technical assistance to populations and communities most impacted by pollution to promote their meaningful participation in all phases of the environmental and land use decision making process.
>
> (D) At a minimum, the meaningful consideration of recommendations from populations and communities most impacted by pollution into environmental and land use decisions.

<u>Senate Bill 535 Disadvantaged Communities</u>

SB 535 was established in 2012 requiring that 25 percent of the funds in the Greenhouse Gas Reduction Fund (or Cap-and-Trade program) received under the Global Warming Solutions Act of 2006 (AB 32) be allocated to projects that benefit disadvantaged communities. Under the 2016 AB 1550, the minimum funding levels are as follows:

- At least 25 percent of funds must be allocated toward disadvantaged communities
- At least five percent must be allocated toward projects within low-income communities or benefiting low-income households
- At least five percent must be allocated toward projects within and benefiting low-income communities, or low-income households, that are outside of a CalEPA-defined disadvantaged communities but within 0.5 mile of a disadvantaged community.

CalEPA designates disadvantaged communities as follows:

1. Census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0
2. Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps but receiving the highest five percent of CalEnviroScreen 4.0 cumulative pollution burden scores.
3. Census tracts identified in the 2017 DAC designation as disadvantaged, regardless of their scores in CalEnviroScreen 4.0.
4. Lands under the control of federally recognized Tribes. For purposes of this designation, a Tribe may establish that a particular area of land is under its control even if not represented as such on CalEPA's DAC map and therefore should be considered a DAC by requesting a consultation with the CalEPA Deputy Secretary for Environmental Justice, Tribal Affairs and Border Relations at TribalAffairs@calepa.ca.gov.[198]

The listed designations were effective as of July 1, 2022.

California Natural Resources Agency

The California Natural Resources Agency is a state agency that is responsible for protecting natural, historical, and cultural resources in California. The California Natural Resources Agency fulfills this mission by overseeing and supporting more than 26 distinct departments, conservancies, and commissions. The California Energy Commission is overseen by the California Natural Resources Agency and therefore required to consider environmental justice in their decision-making process if their actions have an impact on the environment, environmental laws, or policies. Such actions that require environmental justice consideration may include:

- Adopting regulations
- Enforcing environmental laws or regulations
- Making discretionary decisions or taking actions that affect the environment
- Providing funding for activities affecting the environment
- Interacting with the public on environmental issues

It is also the policy of the California Natural Resources Agency to consider the fair treatment of all races, cultures, and incomes during the planning, decision-making, development and implementation of all Resources Agency programs, policies and activities. Environmental justice efforts include, but are not limited to, the following:

- Identifying relevant populations that might be adversely affected by programs or projects submitted by outside parties, as appropriate.

[198] Office of Environmental Health Hazard Assessment. "SB 535 Disadvantaged Communities." Accessed April 17, 2025. https://oehha.ca.gov/calenviroscreen/sb535

- Seeking out and consulting with community groups and leaders to encourage communication and collaboration prior to taking actions that may have an impact on the environment, environmental laws or policies.
- Broadly distributing public information, in multiple languages if appropriate, to encourage participation in public processes.
- Ensuring that public documents and notices relating to environmental issues that may have an impact on human health are concise, understandable, and readily accessible to the public, printed in multiple languages if appropriate.
- Holding required public meetings, hearings, and workshops at times and in locations that encourage meaningful public participation by members of affected communities.
- Working in conjunction with other federal, state, regional, and local agencies to ensure consideration of disproportionate impacts on relevant populations.
- Fostering broad access to existing and proposed data sets and technology to better identify, analyze, and respond to environmental justice issues.
- Providing appropriate training to staff on environmental justice issues so that recognition and consideration of such issues are incorporated into daily program activities.[199]

California Environmental Protection Agency

CalEPA works with CARB, CalRecycle, the Department of Pesticide Regulation, DTSC, the Office of Environmental Health Hazard Assessment (OEHHA), and the SWRCB to implement environmental justice principles and collect data about communities throughout California. Efforts to achieve environmental justice include listening to community concerns from environmental justice liaison, distributing environmental justice grants, and identifying disadvantaged communities that are most impacted by pollution (air quality and GHG emissions). The most recent Disadvantaged Communities Designation was finalized on May 3, 2022.[200]

CalEnviroScreen

CalEnviroScreen is a mapping modeling tool developed by CalEPA Office of Environmental Health Hazard Assessment to identify and address California communities that are disproportionately burned by multiple sources of pollution.[201] The mapping tool includes information about geographics boundaries, air pollution, hazardous threats, sensitive populations, socioeconomic percentiles, and race/ethnicity percents.[202] The latest version of this model Is CalEnviroScreen 4.0, which was released on May 1, 2023.

[199] California Resources Agency. "Environmental Justice Policy." Accessed March 12, 2026. https://www.conservation.ca.gov/Documents/Environmental%20Justice%20Policy%20-%20CNRA.pdf.
[200] California Environmental Protection Agency. "Environmental Justice Program." Accessed March 12, 2026. https://calepa.ca.gov/envjustice/.
[201] Ibid.
[202] Office of Environmental Health Hazard Assessment. "CalEnviroScreen 4.0 Data Dashboard and User Guide." December 2022. Accessed March 12, 2026. https://storymaps.arcgis.com/stories/92100e3cfd4a4b0697db157ed507ab68.

CalEPA has the model provide a CalEnviroScreen score to represent the cumulative pollution burden impact for a census track based on (1) the average of exposures and environmental effects (i.e., Pollution Burden) multiplied by the average of sensitive populations and socioeconomic factors (i.e., Population Characteristics).[203] The pollution burden is calculated using the following factors: cleanup sites, DPM, drinking water contaminants, groundwater threats, hazardous waste impaired waters, lead risk from housing, pesticide use, solid waste sites, traffic impacts, and toxic release from facilities. The population characteristics are based on asthma, cardiovascular disease, education, housing burden, linguistic isolation, low birth weight, poverty, and unemployment. The Pollution Burden and Population Characteristics scores range from 0.1 to 10.[204] The CalEnviroScreen scores range from 0 to 100 with 100 being the highest score. [205]

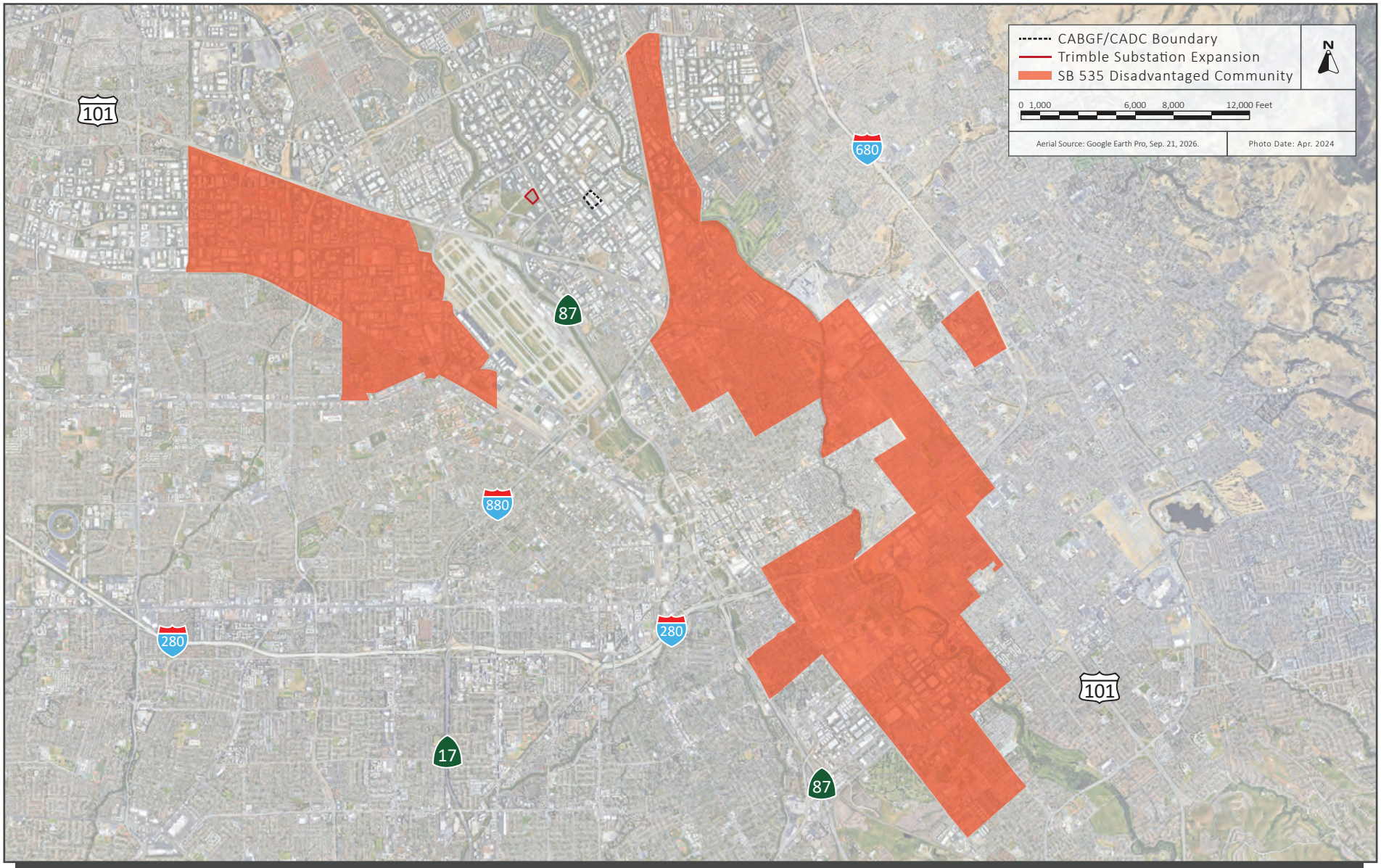
4.21.1.2 *Existing Conditions*

The environmental justice existing conditions and methodology are based on the OEHHA CalEnviroScreen tool due to the EPA terminating the federal environmental justice guidance.[206] For the purposes of this analysis, an environmental justice community is defined as a SB 535 Disadvantaged Community. The Project Component Sites are not within a designated SB 535 disadvantaged community or a SB 535 designated Federal tribal area. The nearest SB 535 disadvantaged community is approximately 0.6 mile east of the CABGF/CADC Site, on the other side of I-880. The nearest federal tribal area is Lytton Rancheria in San Pablo over 45 miles northwest of the Project Component Sites.[207] Refer to Figure 4.21-1.

The Project Component Sites are located within Census Tract 6085505006 as shown in Figure 4.21-2. This census tract has an overall CalEnviroScreen 4.0 score of 39, which indicates a lower burden and vulnerability in this census tract community.[208]

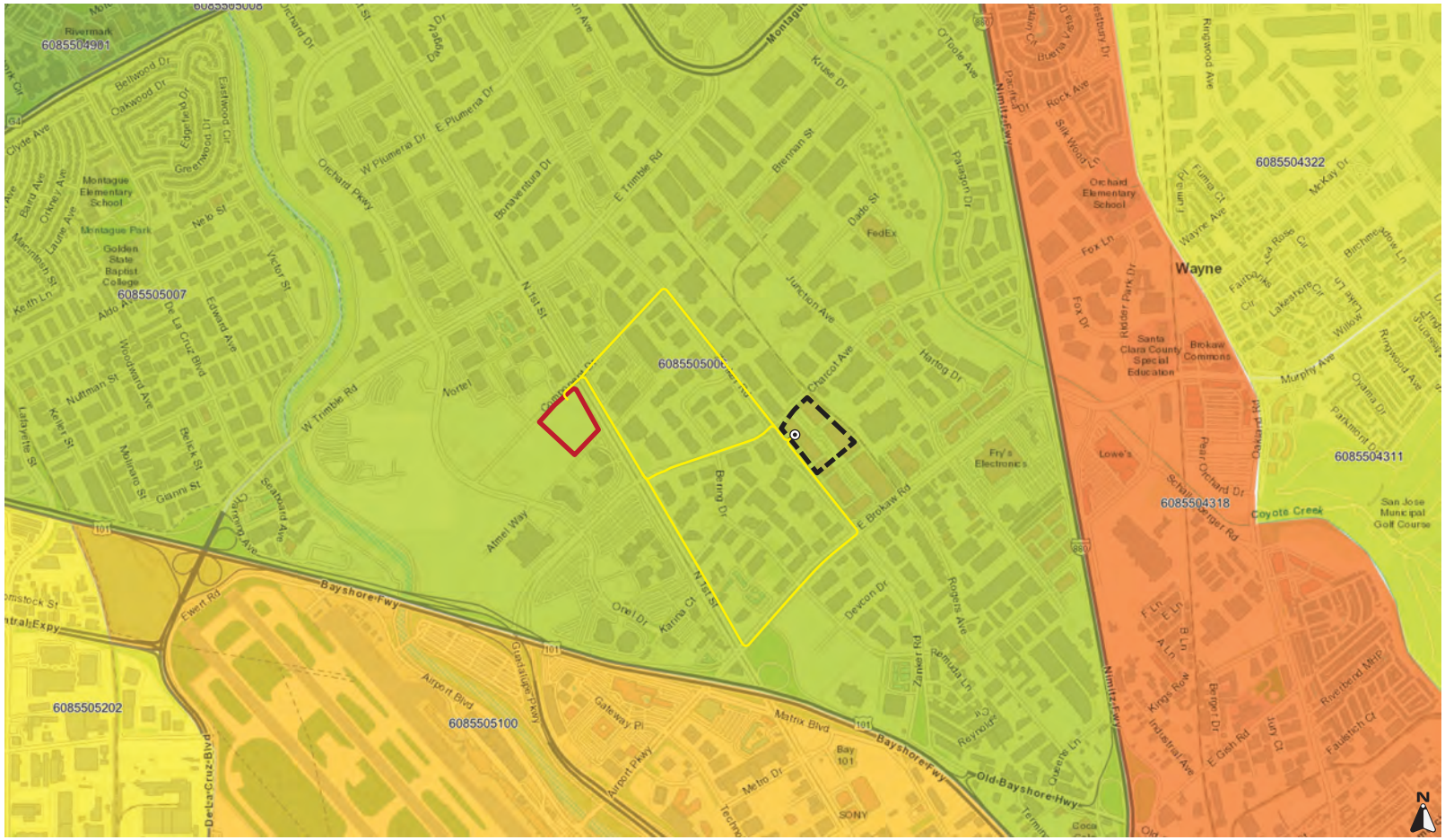
The population in this tract is approximately 11,441 people. Some of the population characteristics of this tract are summarized below and the percentile for the Project Area is shown in Figure 4.21-3.[209]

[203] Office of Environmental Health Hazard Assessment. "Scoring & Model." Accessed March 12, 2026. https://oehha.ca.gov/calenviroscreen/scoring-model
[204] Office of Environmental Health Hazard Assessment. *CalEnviroScreen 4.0 Report*. October 2021. Pages 148 and 198.
[205] Ibid. Page 200.
[206] United States Environmental Protection Agency. "EPA Terminates Biden's Environmental Justice, DEI Arms of Agency." March 12, 2025. Updated March 14, 2025. Accessed May 14, 2025. https://www.epa.gov/newsreleases/epa-terminates-bidens-environmental-justice-dei-arms-agency.
[207] Office of Environmental Health Hazard Assessment. "SB 535 Disadvantaged Communities 2022 (Tribal Update 2024)." Updated September 27, 2024. Accessed May 20, 2026. https://gis.data.ca.gov/maps/OEHHA::sb-535-disadvantaged-communities-2022-tribal-update-2024/about.
[208]Office of Environmental Health Hazard Assessment. "CalEnviroScreen 4.0 Data Dashboard." Accessed May 20, 2026. https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0
[209] Ibid.



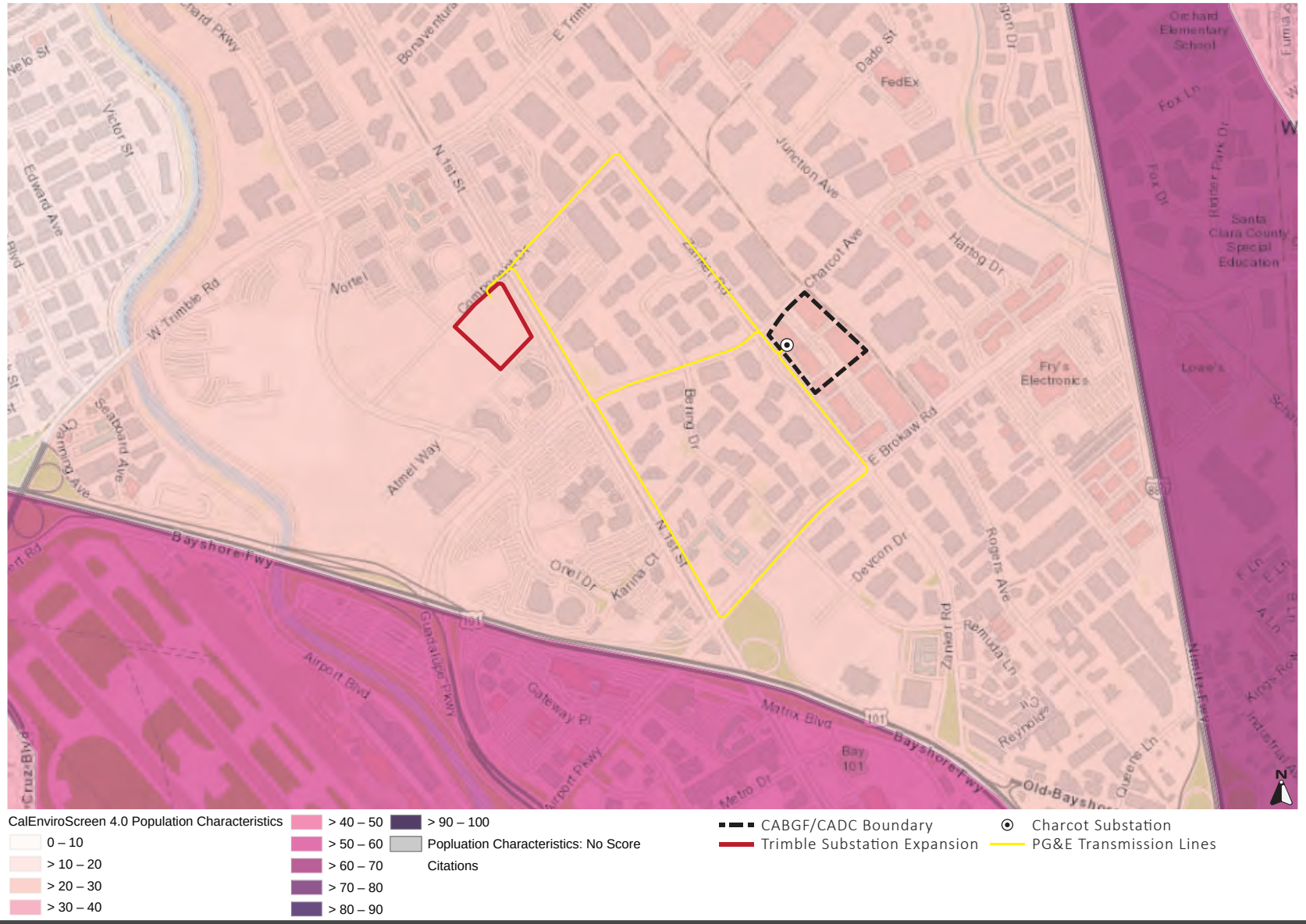
SB 535 DISADVANTAGED COMMUNITIES

FIGURE 4.21-1



CALENVIROSCREEN 4.0 SCORES

FIGURE 4.21-2



POPULATION CHARACTERISTICS PERCENTILE

FIGURE 4.21-3

- Age
    - 12.26 percent of the population is 10 years or younger
    - 86.35 percent of the population is 10 to 64 years
    - 1.39 percent of the population is 65 years or older

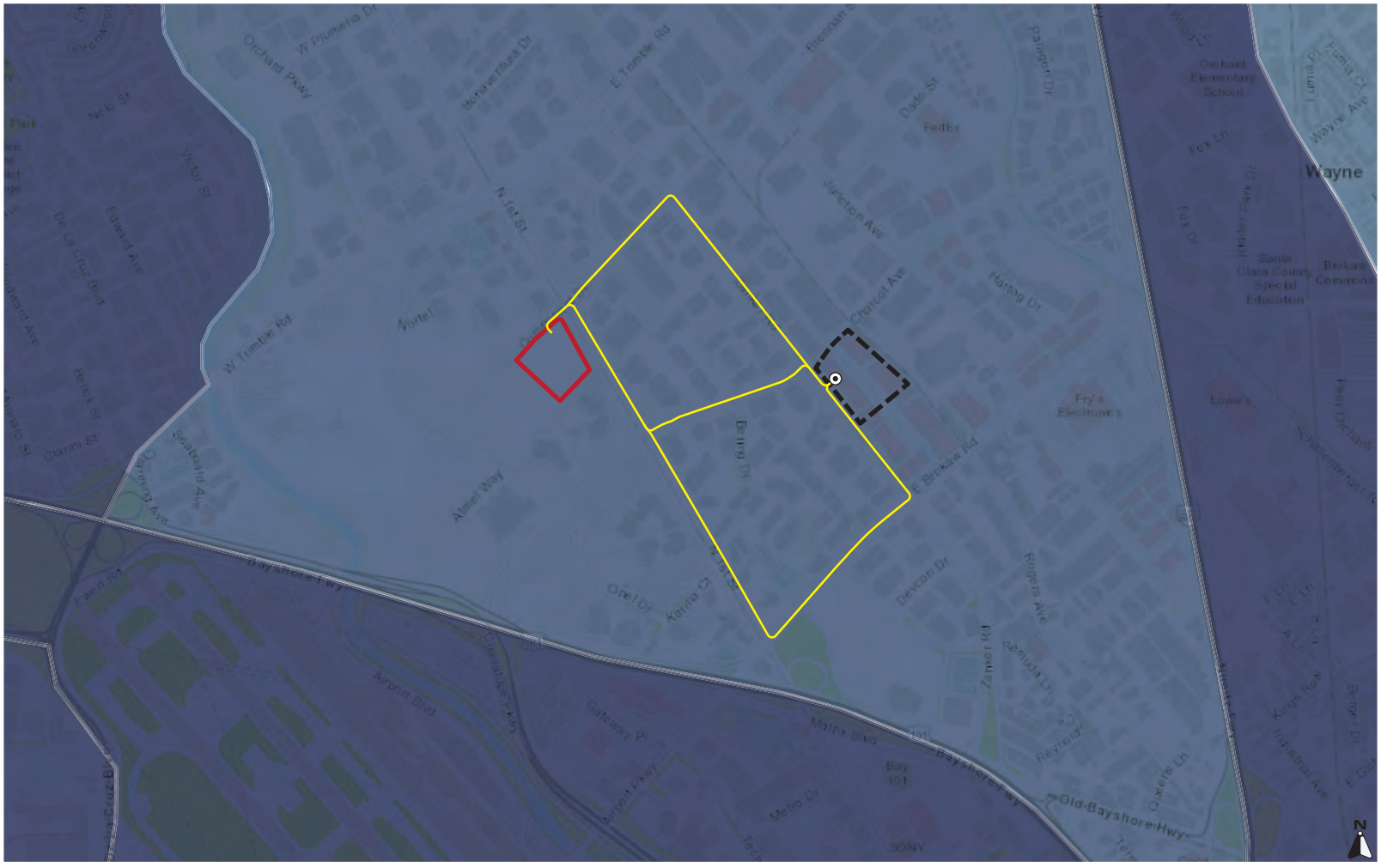
- Race/Ethnicity
    - 1.74 percent of the population is Other
    - 2.18 percent of the population is African American
    - 4.26 percent of the population is Hispanic
    - 24.25 percent of the population is White
    - 67.58 percent of the population is Asian American

Additionally, approximately seven percent of the people in this census tract are living below twice the federal poverty level (a measurement of poverty), which is a relatively low poverty percentage.[210] The overall population characteristics, which represent physiological traits, health status, or community characteristics that can result in increased vulnerability to pollution, of this tract are within the 22nd percentile, which indicates that the population characteristics in this census tract have lower vulnerability to pollution.[211]

The pollution burden, which represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution, of this census tract are summarized below with the overall pollution burden at the 77th percentile, which represents a higher potential of exposure to pollutants and adverse environmental conditions caused by pollution.[212] Refer to Figure 4.21-4 for the pollution burden percentile at the Project Component Sites and surrounding area.

- Exposure Indicators
    - 18th percentile for ozone exposure
    - 25th percentile for $PM_{2.5}$ exposure
    - 84th percentile for DPM exposure
    - 41st percentile for drinking water contamination
    - 39th percentile for toxic release
    - 90th percentile for traffic exposure

[210] Office of Environmental Health Hazard Assessment. "CalEnviroScreen 4.0 Indicator Maps – Population Characteristics." Accessed May 20, 2026. https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/page/Indicators?views=Population-Characteristics#data_s=id%3AdataSource_42-17c3da33767-layer-1~dataSource_36-17c3dc448ec-layer-5~dataSource_25-17c3d89e7e2-layer-1%3A1323%2Cid%3Awidget_306_output_0%3A0.
[211] Ibid.
[212] Office of Environmental Health Hazard Assessment. "CalEnviroScreen 4.0 Indicator Maps – Pollution Burden." Accessed March 12, 2026. https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/page/Indicators?views=Pollution-Burden#data_s=id%3AdataSource_42-17c3da33767-layer-1~dataSource_36-17c3dc448ec-layer-5~dataSource_25-17c3d89e7e2-layer-1%3A1323%2Cid%3Awidget_306_output_0%3A0.



POLLUTION BURDEN PERCENTILE

FIGURE 4.21-4

- Environmental Effects Indictors
    - 100th percentile for cleanup site
    - 94th percentile for groundwater threats
    - 97th percentile for hazardous waste
    - 44th percentile for impaired water
    - 80th percentile for solid waste sites

Since the Project Component Sites are not located within a census tract that is designated as a disadvantaged community pursuant with SB 535 and does not have a score within the top 25 percent of CalEnviroScreen 4.0, the Project Component Sites are not in an area defined as an environmental justice community.

4.21.2 Environmental Impacts

The following resource areas discuss impacts to environmental justice populations: Aesthetics, Air Quality, Cultural and Tribal Cultural Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Transportation and Traffic, and Utilities and Service Systems.

Aesthetics

Environmental justice populations may experience disproportionate visual impacts if the siting of visually intrusive or degrading projects, particularly industrial facilities, occurs within or near environmental justice communities to a greater extent than within the community at large.

As depicted in Figure 4.21-1 the Project Component Sites are not located in a disadvantaged community. As discussed in Section 4.1 Aesthetics, the proposed Project is located within an urbanized area of San José which already experiences light and/or glare from the surrounding development. The Project would be reviewed for consistency with the City's Design Guidelines, and other applicable codes, policies, and regulations to ensure that the Project would not adversely affect the visual quality of the Project area and would conform to existing architectural and landscaping standards. The proposed Project would be required to comply with the City's Outdoor Lighting on Private Development Policy (Policy 4-3). Furthermore, residents in nearby SB 535 disadvantaged communities are over 0.5 mile east of the Project Component Sites and would not be directly impacted by the new light and/or glare from the Project. Implementation of the proposed Project would not substantially degrade the existing visual quality or character of the site or its surrounding area. Therefore, the proposed Project would not have the potential to affect high minority populations. **(Less than Significant Impact)**

Air Quality

The Air Quality analysis for the Project (refer Section 4.3 Air Quality) noted that no sensitive receptors were within 1,000 feet of the project site (the typical buffer distance for health risk

modeling). Instead, health risk modeling was completed for the nearest sensitive receptor to the Project Site as identified in Table 4.3-20. The analysis determined that no off-site receptors (including the nearest resident, worker, and school attendees) would experience any acute or chronic cancer or non-cancer effects of health significance during construction and operation of the Project. Refer to Table 4.3-23, Table 4.3-24, Table 4.3-26, and Table 4.3-27 for the health risk results at off-site receptors. While the Air Quality health risk modeling did not specifically model receptors in a SB 535 disadvantaged community (refer to Figure 4.21-1), the modeling results identified in the mentioned tables show that people residing and working in these areas would not be exposed to public health risks from the project due to the distance.

Both construction and operational emissions from the Project would not cause or contribute to a violation of any state or federal ambient air quality standard, or conflict with applicable plans and programs to attain or maintain ambient air quality. Additionally, air quality emissions generated from the construction of the Project would be further reduced with the incorporation of PDM AIR-1. Based on these conclusions, the Project would not cause disproportionate air quality impacts for sensitive populations like the environmental justice population represented in Figure 4.21-1. **(Less than Significant Impact)**

Cultural and Tribal Cultural Resources

There are no SB 535 disadvantaged communities federal tribal areas within proximity to the Project Component Sites as mentioned above in Section 4.21.1.2 Existing Conditions. The nearest federal tribal area is in San Pablo over 45 miles northwest of the Project Component Sites. At this distance, the Project would have no impact on the identified disadvantaged communities federal tribal areas. **(No Impact)**

Hazards and Hazardous Materials

Environmental Justice populations may experience disproportionate hazards and hazardous materials impacts if the storage and use of hazardous materials within or near SB 535 disadvantaged communities occur to a greater extent than within the community at large. The possibility of a disproportionate impact upon a SB 535 disadvantaged community due to the planned storage and use of hazardous materials on the site is low based on the distance of the Project Component Sites to the nearest SB 535 disadvantaged community (over 0.5 mile east of the Project Component Sites).

The Project would contain diesel fuel, a hazardous material, to run the emergency generators. As discussed in Section 4.9 Hazards and Hazardous Materials, each generator unit and its integrated fuel tanks would be designed with double walls. The interstitial space between the walls of each tank would be continuously monitored electronically for the existence of liquids. This monitoring system would be electronically linked to an alarm system in the engineering office that would alert personnel if a leak were detected. Additionally, the standby generator units would be housed within a self-sheltering enclosure that prevents the intrusion of storm water. Therefore, the

likelihood of a spill of sufficient quantity to impact the surrounding community and environmental justice population would be very unlikely and is considered less than significant. Further, implementation of PDMs would ensure potential existing soil and groundwater contamination on the site would not be released into the environment. **(Less than Significant Impact)**

Hydrology and Water Quality

A disproportionate hydrologic or water quality impact on an environmental justice population could occur if a project required substantial groundwater resources or contributed significantly to surface water or groundwater quality degradation.

As discussed in Section 4.10 Hydrology and Water Quality, the Project is not located within a designated groundwater recharge zone and, therefore, would not require substantial groundwater resources. The Project is not expected to significantly contribute to surface water degradation, as it would include stormwater quality BMPs, such as directing site runoff into bioretention areas, and would reduce impervious surface area compared to existing conditions. The Project would be required to comply with the Clean Water Act by controlling the discharge of pollutants in storm water during its construction and operation phases. Additionally, implementation of PDMs would reduce hydrology impacts to less than significant levels. Additionally, implementation of the City's Standard Permit Conditions would reduce impacts from construction activities to less than significant levels. The Project's hydrology and water quality impacts would be reduced to less than significant for all the area's population, including the environmental justice population. Therefore, the Project is not expected to negatively impact water quality or flood hazards and would not result in a disproportionate impact to the local SB 535 disadvantaged communities population. **(Less than Significant Impact)**

Land Use and Planning

A disproportionate land use impact on an environmental justice population could occur if a project would physically divide the established community of an environmental justice population or if a project near an environmental justice population would conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental impacts on a population.

As discussed in Section 4.11 Land Use and Planning, the Project would not divide an existing community, as the site is on land designated and zoned for industrial uses and is generally surrounded by industrial uses and commercial uses. The CABGF/CADC and Trimble Substation Expansion Project Sites are designated IP under the City's General Plan and would be consistent with the land use designation. The transmission line routes would be located in the public right-of-way or within existing PG&E easements on developed land.

There would be no conflicts with plans, policies, or related land use regulations due to the construction and operation of the Project. Therefore, the Project would not pose significant

individual impacts relating to land use and planning, and no disproportionate impacts on the environmental justice population would occur either. **(No Impact)**

Noise and Vibration

Environmental justice populations may experience disproportionate noise impacts if the siting of unmitigated industrial facilities occurs within or near environmental justice communities to a greater extent than within the community at large. As shown in Figure 4.21-3, the CABGF/CADC Project Site is not located within an area of low-income and high minority populations.

Demolition and construction activities would increase existing noise levels at the adjacent land uses, but they would be temporary and intermittent. As discussed in Section 4.13 Noise and Vibration, implementation of measures incorporated into the Project design would reduce construction noise impacts to less than significant levels (PDM NOI-1). Operational noise from the CABGF/CADC would also be further reduced with the implementation of PDM NOI-2, which requires that noise reduction measures be included into the mechanical equipment design. Furthermore, the nearest environmental justice community is over 0.5 mile east of the CABGF/CADC Site and construction an operational noise at the distance would not be perceptible. Therefore, potential noise effects related to construction and operation would not result in a significant noise impact on the Project Area's population, including the environmental justice population.

Additionally, the noise from operation of the CABGF/CADC would not exceed the City's noise limits at the nearest land uses with implementation of PDM NOI-2; therefore, the CABGF/CADC's noise impacts would be reduced to less than significant for all the area's population, including the environmental justice population. **(Less than Significant Impact)**

Population and Housing

The potential for population and housing impacts to environmental justice populations is predominantly driven by the temporary influx of non-local construction workers seeking lodging closer to a Project Site. For the Project, the construction workers would be drawn from the greater Bay Area and would not likely seek temporary lodging closer to the Project Component Sites. The Project would be a low employment-generating use once constructed due to the nature of a data center. Therefore, approval of the Project would not substantially increase jobs in the City. The operations workers are also anticipated to be drawn from the greater Bay Area and would not likely seek housing closer to the Project Component Sites. If some operations workers were to relocate closer to the Project Component Sites, there would be sufficient housing in the Project area.

A population and housing impact could disproportionately affect an environmental justice population if the Project were to displace minority or low-income residents from where they live, causing them to find housing elsewhere. If this occurs, an environmental justice population may have a more difficult time finding replacement housing due to racial biases and possible financial constraints. As discussed in Section 4.14 Population and Housing, the Project would not displace

any residents or remove any housing; therefore, there would be no disproportionate impact to environmental justice populations from this Project. **(No Impact)**

Transportation and Traffic

Significant reductions in levels of service have the potential to significantly impact environmental justice populations. in particular, an impact to bus transit, pedestrian facilities, or bicycle facilities could cause disproportionate impacts to low-income communities, as low-income residents more often use these modes of transportation. However, as discussed in Section 4.17 Transportation, all transportation and traffic impacts, including impacts to alternative transportation, would be less than significant, and therefore, would cause less than significant impacts to environmental justice populations. Likewise, transportation and impacts would not be disproportionate. **(Less than Significant Impact)**

Utilities and Service Systems

A disproportionate utility or service system impact on an environmental justice population could occur if a project required substantial water resources or significantly impacted wastewater treatment facility and landfill capacity. As determined in Section 4.19 Utilities and Service Systems, adequate water supply is available to serve the Project. The Project would, therefore, not result in a disproportionate impact to the local environmental justice population. There is also significant remaining capacity at the local landfill and wastewater treatment facilities that would be utilized by the Project. No changes or expansion to the landfill or wastewater treatment facility would be needed to accommodate the Project. The Project would also be required to comply with state and local regulations that apply to construction and operation waste. These regulations would require that wastes be managed to meet waste diversion goals and protect public health and safety. Therefore, the Project's Utilities and Service Systems impacts would be less than significant for all the area's population, including the environmental justice population. **(Less than Significant Impact)**

Section 5.0 Growth-Inducing Impacts

The CEQA Guidelines require that an EIR identify the likelihood that a proposed project could "foster" or stimulate "economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment" (Section 15126.2(d)). This section of the SPPE Application is intended to evaluate the impacts of such growth in the surrounding environment.

The CABGF/CADC is proposed on an infill site in San José. The new electrical connections to the PG&E Trimble Substation Expansion will be built and constructed to serve the CABGF/CADC as part of Prologis's request for electricity from PG&E and are intended to serve the CABGF/CADC, not the surrounding area. Any future projects that PG&E could serve would require additional upgrades within the PG&E Trimble Substation Expansion. As a result, the project does not include expansion of the existing infrastructure that would facilitate growth in the project vicinity or other areas of the City. For these reasons, the Project would not include the expansion of the existing infrastructure that would facilitate growth in the Project vicinity or other areas of the City.

Development of the Project would place a new data center, substation expansion, transmission lines, and multi-modal improvements in the middle of an industrial area. The Project would be compatible with the surrounding land uses and would not pressure adjacent industrial, office, and commercial properties to redevelop with new or different land uses. The Project would reduce the employee capacity of the site, from approximately 349 employees currently to 45 future employees.[213]

Therefore, the Project would not have a significant growth inducing impact. **(Less than Significant Impact)**

[213] According to the ITE Trip Generation Handbook, 10th edition, an Industrial Park land use would generate 3.37 daily trips per 1,000 square feet, or 2.91 daily trips per employee. By calculating the daily trips per square footage (1,015 daily trips), the equation assumptions were used to backtrack calculate the site's estimated employment. The following equation was used: 1,015/2.91 = 349 employees.

Section 6.0 Significant and Irreversible Environmental Changes

This section was prepared pursuant to CEQA Guidelines Section 15126.2(c), which requires a discussion of the significant irreversible changes that would result from the implementation of a proposed Project. Significant irreversible changes include the use of nonrenewable resources, the commitment of future generations to similar use, irreversible damage resulting from environmental accidents associated with the Project, and irretrievable commitments of resources. Applicable environmental changes are described in more detail below.

6.1 Use of Nonrenewable Resources

The proposed Project, during construction and operation, would require the use and consumption of nonrenewable resources. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Nonrenewable resources include fossil fuels and metals. Renewable resources, such as lumber and other wood byproducts, could also be used.

Energy would be consumed during both the construction and operational phases of the Project, which includes the CABGF/CADC Site, Trimble Substation Expansion Site, PG&E transmission line routes, and the off-site multi-modal improvements. The construction phase would require the use of nonrenewable construction material, such as concrete, metals, and plastics, and glass. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, preparation of the site, and construction of the buildings and intersection improvements. The operational phase would consume energy for multiple purposes including, but not limited to, building cooling, lighting, appliances, and electronics in the CABGF/CADC. Energy, in the form of fossil fuels, would be used to fuel vehicles traveling to and from the Project Component Sites. The CABGF/CADC has also committed to either purchase or participate in a program that would achieve the same objective of carbon-free electricity use during operations and the use of renewable diesel (See Sections 3.7 Project Design Measures and 4.8 Greenhouse Gas Emissions – PDM GHG-1 and PDM GHG-2). The CABGF/CADC would also be subject to the standard California Code of Regulations Title 24 Part 6 and CALGreen energy efficiency requirements. For these reasons, the Project would not result in a substantial increase in demand for nonrenewable resources.

Section 7.0 Significant and Unavoidable Impacts

A significant unavoidable impact is an impact that cannot be mitigated to a less than significant level if the project is implemented as it is proposed. The Project would not result in significant unavoidable impacts.

Section 8.0 Alternatives

8.1 Evaluation Criteria

The primary goal of the CADC is to be a state-of-the-art data center that provides greater than 99.999 percent reliability. The CADC has been designed to reliably meet the increased demand of digital infrastructure, its customers, and its continued growth. The CADC's purpose is to provide its customers with mission critical space to support their servers, including space conditioning and a steady stream of high-quality power supply. Interruptions of power could lead to server damage or corruption of the data and software stored on the servers by Prologis' clients. The CADC will be supplied electricity by an expansion to the existing PG&E Trimble Substation located at 44467 Component Drive in the City of San Jose (herein referred to as "Trimble Substation Expansion").

To ensure a reliable supply of high-quality power, the CABGF was designed to provide backup electricity to the CADC only in the event electricity cannot be supplied from PG&E and delivered to the CADC building. To ensure no interruption of electricity service to the servers housed in the SCDC building, the servers will be connected to uninterruptible power supply (UPS) systems that store energy and provide near-instantaneous protection from input power interruptions. However, to provide electricity during a prolonged electricity interruption, the UPS systems will require a flexible and reliable backup power generation source to continue supplying steady power to the servers and other equipment. The CABGF provides that backup power generation source.

The CADC's Project Objectives are as follows:

1. Develop a state-of-the-art data center large enough to meet tenant demands and market conditions to the maximum extent feasible consistent with local regulatory and technological constraints.
2. Develop the CADC on land that is zoned to allow data center use at a location acceptable to the City of San José;
3. Develop the CADC close to existing PG&E infrastructure where adequate electricity is available in a cost effective and timely manner;
4. Develop the CADC on property owned by Prologis, consisting of a min of 10 acres where existing uses are not providing the highest and best use for the property (taking into account lease terms and building conditions on sites with existing buildings)
5. Incorporate the most reliable and flexible form of backup electric generating technology into the CABGF considering the following evaluation criteria.
    - **Reliability**. The selected backup electric generation technology must be extremely reliable in the case of an emergency loss of electricity from the utility.
        - The CABGF must provide a higher reliability than 99.999 percent in order for the CADC to achieve an overall reliability of equal to or greater than 99.999 percent.

        - The CABGF must provide reliability to the greatest extent feasible during natural disasters including earthquakes.
        - The selected backup electric generation technology must have a proven built-in resilience so if any of the backup unit fails due to external or internal failure, the system will have redundancy to continue to operate without interruption.
        - The CADC must have on-site means to sustain power at full load for the data center for 24-hours minimum in failure mode, inclusive of utility outage.
    - **Commercial Availability and Feasibility**. The selected backup electric generation technology must currently be in use and proven as an accepted industry standard for technology sufficient to receive commercial guarantees in a form and amount acceptable to financing entities. It must be operational within a reasonable timeframe where permits and approvals are required.
    - **Technical Feasibility**. The selected backup electric generation technology must utilize systems that are compatible with one another.

As part of the preliminary planning and design of the CADC and the CABGF, Prologis considered alternatives to the proposed backup generators and use of a smaller capacity system. For completeness purposes, a discussion of the No Project Alternative is also included. During its site due diligence, Prologis did not identify any alternative sites that are capable of attaining most of the Project Objectives above, and which are not otherwise under consideration for development.

8.2 No Project Alternative

The CEQA Guidelines [Section 15126(d)4] require an EIR specifically include a "No Project" alternative. The purpose of including a No Project alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the No Project alternative is "what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services." [Section 15126.6(e)(2)] The Guidelines emphasize that an EIR should take a practical approach, and not "…create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment [Section 15126.6(e)(3)(B)]."

The CABGF/CADC Site is currently developed with five fully occupied light industrial and warehouse buildings totaling approximately 301,064 square feet, along with surface parking lots, and utility infrastructure. Under the No Project Alternative, no new construction at the CABGF/CADC Site would occur, and current conditions would continue at the site. New tenants may occupy the buildings over time, consistent with current zoning and General Plan regulations.

The CABGF/CADC Site is designated as IP per the City of San José's General Plan. This land use designation allows for a variety of industrial uses, such as research and development, manufacturing, assembly, testing, and offices. The corresponding zoning district for this site is the IP zoning district. The IP zoning district (similar to the IP land use designation) is established with specific development standards intended to ensure development is compatible with surrounding uses and implements the site's General Plan land use designation. The City of San José's Zoning Ordinance permits data centers with a Special Use Permit and emergency generators with an Administrative Use Permit.

Additionally, because the Trimble Substation Expansion Site is owned by PG&E and would be developed as part of PG&E's planned infrastructure upgrades intended to serve existing development and planned growth in the region, impacts associated with the Trimble Substation Expansion would still occur under the No Project Alternative.

The No Project Alternative would avoid the proposed Project's less than significant impacts identified in the SPPE Application (no impact compared to the proposed project's less than significant impact). The No Project Alternative would not meet any of the Project Objectives.

8.3 Reduced Scale Alternative

A potential project alternative would consist of development of a 49 MW CADC with 49 MW of backup generation capacity in the CABGF. Under this alternative, the square footage of the CADC would be roughly half of the square footage identified for the proposed project, and there would be roughly half the number of backup generators in the CABGF.

Since no significant and unavoidable impacts were identified for the Project, this alternative would not avoid or substantially lessen any significant impacts. Additionally, this alternative would not preclude the need for the Project Design Measures identified in the SPPE Application. For example, construction air quality emissions and noise impacts would be somewhat reduced since a smaller facility would be constructed. However, as described in Section 4.3 Air Quality and Section 4.13 Noise of the SPPE Application, the Project would not result in significant construction air quality emissions (criteria air pollutant emissions or health risks) or construction noise or vibration impacts. The Project's operational NO_x emissions would be reduced to a less than significant level through the required purchase of off-set credits from the Air District. While PDM AIR-1 (Fugitive Dust Best Management Practices) and PDM NOI-1 (Construction Noise Best Management Practices) are identified, both measures are general best management practices, not project-specific construction reduction measures related to the construction of a larger facility, and they would remain applicable even if a smaller facility were constructed. A smaller facility would also generate fewer operational NO_x emissions; however, emissions would likely still be above the Air District threshold and off-set credits would still be required consistent with Air District NSR Rule (Regulation 2 Rule 2), section 2-2-302. Most of the land cover impacts on the CABGF/CADC Site (e.g., biological resources, cultural resource, geology and soils, hazards and hazardous materials, and hydrology) would stay

the same regardless of whether a larger or smaller facility were constructed, as the site is currently developed and the underlying conditions on the site would be the same. Furthermore, the smaller facility under this alternative would still need to comply with the PDMs related to GHG and transportation to incorporate carbon-free electricity into the Project and reduce project-generated trips. Due to the reduced size and capacity of the CADC under this alternative, fewer rooftop chillers would be needed. As a result, noise from operation of the rooftop chillers would be reduced. As described in Section 4.13.2, noise from the rooftop chillers would exceed applicable noise limits at the nearest sensitive receptors (i.e., hotels located to the southwest) without implementation of noise attenuation measures. The SPPE identifies PDM NOI-2, which requires the use of quieter chillers and/or a rooftop screen wall to reduce noise levels. Under this alternative, the noise attenuation requirements in PDM NOI-2 may not be needed to the same degree as the proposed project. Regardless, under either scenario, noise levels would not exceed applicable thresholds, and the impact would be less than significant.

The Trimble Substation Expansion would still be needed to serve the CADC under this alternative, as the existing Trimble Substation does not have enough capacity to serve a new 49 MW data center. As a result, impacts related to the Trimble Substation Expansion would still occur under this alternative, albeit to a potentially lesser degree if the substation expansion were to require a smaller footprint than the proposed project. Similar to the discussion above for the CADC/CABGF, even if impacts may be somewhat reduced if a smaller substation expansion is constructed, this alternative would not avoid the need for implementation of any of the PDMs identified for the Trimble Substation Expansion.

Although this alternative would meet some of the Project Objectives, it would not meet the primary objective (Objective 1) for the CADC of developing a state-of-the-art data center large enough to meet tenant demands and market conditions to the maximum extent feasible, nor would it fully meet Objective 3 as the cost to bring PG&E infrastructure to the CADC site would remain the same, making it less cost effective to extend electrical service to a smaller data center. Additionally, this alternative would not avoid or substantially lessen any identified significant environmental impacts.

8.4 Alternatives Considered but Rejected

8.4.1 Location Alternative

There is no rule requiring an EIR to explore off-site project alternatives in every case. As stated in the Guidelines: "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (Guidelines, § 15126.6, subd. (a).) As this implies, "an agency may evaluate on-site alternatives, off-site alternatives, or both." (Mira Mar, supra, 119 Cal.App.4th at p. 491.) The Guidelines thus do not require analysis of off-site alternatives in every

case. Nor does any statutory provision in CEQA "expressly require a discussion of alternative project locations." (Id. at p. 491 citing Pub. Res. Code, §§ 21001, subd. (g), 21002.1, subd. (a), 21061.)
In considering an alternative location in an EIR, the CEQA Guidelines advise that the key question is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location."[214] As described throughout the SPPE Application, no significant and unavoidable impacts were identified for the Project. Some impacts were identified that required implementation of Project Design Measures or other standard conditions to reduce the impacts to a less than significant level, including air quality (fugitive dust), biological resources (nesting birds, burrowing owls, bird collision, habitat plan compliance, and tree removal), cultural resources (construction ground disturbing activities), geology and soils (seismic impacts and paleontological resources), greenhouse gas emissions (carbon-free energy), hazards and hazardous materials (soil contamination), hydrology (stormwater), noise (construction noise), and transportation (vehicle miles traveled). Since these impacts are primarily related to typical construction activities planned on-site and typical data center operational impacts, it is reasonable to assume that similar impacts could result at an alternative project location, and similar Project Design Measures or other standard conditions would be required.

A possible exception would be potential impacts related to burrowing owls associated with the Trimble Substation Expansion Site, since not all potential alternative locations for the electric infrastructure needed to serve the data center would be located on or near potential burrowing owl habitat. However, as described in the SPPE Application, the Project is not expected to result in direct impacts to burrowing owls, and impacts to potential burrowing owl habitat would be reduced to a less than significant level.

In general, an alternative location would not necessarily avoid or substantially lessen the Project's impacts, nor would it preclude the need for the Project Design Measures identified in the SPPE Application. Moreover, the City's current Standard Permit Conditions for all development projects in San José require reduction measures for air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology, noise, and transportation impacts. Nearby jurisdictions have similar requirements, either as permit conditions, conditions of approval, or General Plan policies. Thus, similar reduction measures would have been required as Project Design Measures or pursuant with standard conditions even if an alternative site were to be selected. For all these reasons, most of the impacts of the Project would not be reduced or avoided by constructing the project on a different parcel.

Additionally, prior to filing the application for the proposed project, the applicant completed due diligence in the project area to determine potential properties within its existing real estate portfolio that were suitable for redevelopment with a data center. While the applicant owns other properties with similar characteristics to the CABGF/CADC Site, these properties are already under consideration for redevelopment. The CABGF/CADC Site is the only remaining site that was found that was available for redevelopment and had the required site characteristics to accommodate the

[214] CEQA Guidelines Section 15126.6(f)(2)(A)

proposed development. Due to the fact that the applicant does not control other parcels within Silicon Valley suitable for the proposed project that are not already under consideration development, and because an alternative location would not avoid or substantially lessen any significant environmental impacts, a Location Alternative was rejected from further consideration.

8.4.2 Reduced Generating Capacity Alternative

A potential project alternative would consist of development of the CADC as proposed with 99 MW of capacity, but the CABGF would be reduced to 49 MW of backup generation capacity through a reduction in the amount of generators. Development of a 99 MW data center with backup generating capacity less than the total demand of the data center at maximum occupancy would not allow Prologis to provide the critical electricity that would be needed during an emergency. It is important to note that in addition to the electricity that is directly consumed by the servers themselves, the next largest load of the data center is related to cooling the rooms where the servers are located. In order for the servers to function reliably, they must be kept within temperature tolerance ranges. The industry standard is to design and operate a building that can meet those ranges even during a loss of electricity provided by the existing electrical service provider. Therefore, in order for Prologis to provide the reliability required by its clients it was necessary to provide a backup generating system that could meet the maximum load of the CADC during full occupancy and include redundancy as described in Section 2.2.3.

Additionally, under this alternative, the only substantial change to the project would be the reduction in the number of backup generators. The development footprint would remain the same, and the operational impacts of the CADC would not change. The primary impacts associated with the backup generators are related to air quality and noise. Emissions of pollutants from testing and maintenance of the generators would be reduced under this alternative. However, emissions from the proposed project are already below relevant thresholds with the purchase of off-set credits, and impacts would be considered less than significant under both the proposed project and this alternative. In the area of noise, generators would be operated one at a time for up to one hour for testing and maintenance (for a maximum of eight hours per day) under both the proposed project and this alternative. As a result, the noise impacts from the generators would be the same under either scenario.

A data center with less than full capacity backup generation facility would not fulfill primary objective (Objective 1) for the CADC of developing a state-of-the-art data center large enough to meet tenant demands and market conditions to the maximum extent feasible, nor would it meet Objective 5 of providing reliable backup power. As a result, this alternative was rejected from further consideration.

8.4.3 Backup Electric Generation Technology Alternatives

Prologis considered using potentially available alternative technologies: gas-fired turbines; flywheels; gas-fired reciprocating internal combustion engines, batteries; fuel cells; and alternative

fuels. As discussed below, none of the technologies considered could meet the overall Project Objectives because they were commercially or technically infeasible and/or would not meet the necessary standard of reliability during an emergency.

8.4.3.1 *Flywheels*

Flywheel energy storage systems use electric energy input which is stored in the form of kinetic energy. Kinetic energy can be described as "energy of motion," in this case the motion of a spinning mass, called a rotor. The rotor spins in a nearly frictionless enclosure. When short-term backup power is required because utility power fluctuates or is lost, the inertia allows the rotor to continue spinning and the resulting kinetic energy is converted to electricity.

Prologis has concluded that flywheel technology would not be a viable option and could not meet the Project Objectives for the following reasons:

- Flywheel technology does not perform within the required reliability levels of Prologis and is prone to system failure.
- Flywheel technology requires an extensive amount of maintenance to keep each energy storage system functioning.
- Flywheel systems cannot provide sufficient time duration (e.g., 24 hours or more) as a backup generation as the fly wheel motion can typically only sustain 10-30sec outages at a time.

8.4.3.2 *Gas-Fired Turbines*

Prologis considered using natural gas-fired turbines instead of diesel generators to supply backup power for the CADC. This technology option was rejected because it would not meet the Project Objectives. Natural gas turbines have the advantage of better emissions of NO_x and CO than diesel. However, as an emergency backup choice, it has the following deficiencies:

1) The gas infrastructure is more likely to experience fuel curtailments during natural disasters and other emergency loss of utility power than liquid fuel sources.
2) On-site storage of natural gas to address the curtailment issues during an emergency is infeasible to support long duration of backup (24 hours or longer time) due to the volume required.
3) The natural gas turbine is better suited for continuous operation instead of standby mode, which makes maintenance challenging.
4) The natural gas turbine needs minimum loads (30%), so additional load banks are required on site resulting in more use of fuel than is necessary and wasting of electricity through the load bank.

5) Typical turbine engines have larger system sizes (4MW-50MW), while the smaller ones such as micro-turbines of 2.5MW will use twice the physical footprint and cost twice as much as the proposed generation technology.

Therefore, natural gas turbines are not considered reliable enough to meet the extremely high reliability requirements of a mission critical data center like the CADC.

In addition, a fixed fuel source such as a natural gas pipeline introduces another potential point of failure or load curtailment. Taking into account the natural gas outages from maintenance and repair by the utility, interruption due to construction accidents within the system, long-term damage and interruption during an earthquake, or outages caused by problems within the greater distribution system are higher probability occurrences than being able to obtain diesel fuel for longer than 24-hour outages. In California, there has only been one large data center permitted that uses natural gas pipelines and was proposed by Microsoft (SJC02 Project 19-SPPE-04) . Microsoft filed an SPPE Application for its SJ04 Project (22-SPPE-02) and explained in its SJ04 SPPE Application why it was proposing diesel backup generators and not natural gas filed generators similar to SJC02:

> Although Microsoft is developing the San Jose City Data Center (SJC02) with the use of natural gas generators to be operated by Enchanted Rock, the SJC02 site enjoys a unique setting. The SJC02 site has two redundant high pressure natural gas pipelines that deliver natural gas from two separate regional backbones. This setting is largely due to the existence of the natural gas pipeline that was built as part of the Los Esteros power plant adjacent to the SJC02 site. The SJC02 site is able to maintain redundant interconnections to both of the high-pressure natural gas pipelines. These two independent pipelines, connected to independent sources of natural gas supply, increases the probability of natural gas being delivered to the SJC02 site during emergencies that likely could interfere with operations of one of the delivery pipelines. Microsoft has determined that the reliability of the SJC02 project can therefore meet its Project Objectives for that data center due to the unique provision of natural gas pipeline redundancy for the SJC02 site.[215]

To provide a reliable redundant supply to the CABGF, the supply of gas needs to be provided from two separate backbone pipelines that connect to two different supplies of natural gas. For the same reasons articulated by Microsoft in its SJ04 SPPE Application, Prologis has concluded that it cannot meet the reliability needs of its customers because two redundant pipelines to two natural gas backbone pipelines with two different sources of natural gas are infeasible at the CAGF Site.

In addition, Prologis has proposed Project Design Measures and believes that all of the potentially significant impacts related to the CABGF, with mitigation, will be less than significant. Therefore, while natural gas-fired generators could reduce emissions, they would not “reduce a significant impact from the CAGF.”

[215] Microsoft SJ04 SPPE Application, Section 8 page 284 TN245949.

Therefore, this alternative was rejected as not being able to meet the Project Objectives.

8.4.3.3 *Gas-Fired Reciprocating Engines*

Prologis considered using natural gas-fired reciprocating engines instead of diesel generators to supply emergency backup power for the CADC. This technology option was rejected because it would not meet the Project Objectives. While natural gas engines could achieve start up times sufficient to work with the UPS systems design and there are 2.5MW/3.1MW engines available, they lack sufficient resilience to accept large block transfer of load associated with restart sequences when transferring from utility grid to backup generation. As discussed above, storage of sufficient natural gas on site to maintain emergency backup electricity demands of the CADC during an outage would not be tenable given the volume of natural gas that would be required. Therefore, natural gas reciprocating engines are not considered technically feasible or reliable enough to meet the industry standard or needs of the CADC site.

8.4.3.4 *Battery Storage*

Prologis considered using batteries alone as a source of emergency backup power. The primary reason batteries alone were rejected was the limited duration of battery power. Batteries can provide power quickly, which is the reason Prologis has incorporated them into the overall backup electrical system design through the use of the UPS. As described in Section 3.4.1.3, batteries in the UPS System would be initiated at the first sign of electricity interruption. However, the current state of battery technology does not allow for very long durations of discharge at building loads as high as planned for the CADC. Maximum discharging time is about five hours when doubled up from one ISO container to two, which needs more physical space. In addition, Lithium-ion batteries have more restrictive California fire code regulations. Renewable non-Lithium-ion batteries such as ZnMnO2 are not commercially feasible for data centers yet. Once the standalone batteries are completely discharged, the only way they can be recharged without on-site generation is if the utility electrical system is back up and running. Since it is not possible to predict the duration of an electricity outage, batteries are not a viable option for emergency electrical power.

The proposed diesel generators provide 24-hours of backup electricity without the need for refueling. In order to provide for the same 24-hour capacity, approximately 10 ISO containers representing approximately ten times the amount of real estate would be required. The site will not accommodate the number of batteries necessary.

Therefore, because battery storage cannot provide the duration that may be necessary during an emergency and the site cannot accommodate the space necessary for adequate battery storage, this technology option was rejected as technically and commercially infeasible and unable to allow the CADC to meet its Project Objectives.

8.4.3.5 *Fuel Cells – Backup Replacement*

Prologis considered fuel cells as a backup generating technology. Fuel cells can provide both primary and off grid power. The fuel cells utilized by Bloom Energy and others are Solid Oxide Fuel Cells that operate in high temperature of 750 degrees Celsius, and they need to stay hot to provide power. As a choice of backup, fuel cells need to run continuously in dual modes, as a primary source, or a standby mode when the grid is off (islanding mode). The fuel cells have additional ultra capacitors to cope with the 10-20 second load transfer time to match up with diesel generation technology.

The fuel cell has the following technical issues that negatively affect its ability to be utilized as an emergency backup generation option.

1. It needs to run continuously to provide base load electricity to stay hot. This is why large data centers (e.g., Equinix, Apple, Yahoo) use Bloom Energy as a primary source and maintain their existing emergency diesel generation fleet as backup.
2. Fuel cells require approximately three times more space than the emergency generators proposed for the Project and stacking is challenging and difficult and expensive to design to applicable codes.
3. Fuel cells rely on the natural gas as feed stock, so the issues with natural gas infrastructure and on-site storage described above also limit reliability.

There are fuel cell technologies (Proton Exchange Membrane) that utilize liquid hydrogen as a fuel. This type of fuel cell is mostly used for mobile sources and can start cold quicker similar to a combustion engine. Prologis understands that there are pilot programs to scale this type of fuel cell to larger sizes. However, the issues that affect the Project Objectives of this technology include:

1. The technology is not yet commercially available at sizes necessary for a large data center.
2. The footprint is projected to be about twice the size of the proposed emergency generators.
3. On-site storage of 48 hours of liquid hydrogen would take significant additional space not available at the Project Site.
4. The potential for on-site and off-site impacts of a large release of liquid hydrogen which would be stored at pressure (6000 PSI) at the Project Site would be likely unacceptable within San José.

8.4.3.6 *Fuel Cells – Primary Generation/Grid Backup*

Prologis has evaluated generating primary electricity with fuel cells on-site and relying on the electricity grid for emergency backup electricity. There are two primary reasons that this solution cannot achieve the Project Objectives. The first is that it is unlikely that PG&E would procure and reserve the amount of electricity necessary to power the CADC in perpetuity as a backup source on

a moment's notice. The magnitude of electricity for such an event after full buildout of the CADC would render such an option infeasible.

As currently designed, the CABGF will provide a 2N protection scheme for the CADC. In other words, the primary electricity will be provided by the extremely reliable PG&E electric system and if that system fails, the diesel-fired emergency generators would provide the electricity the CADC requires. Utilizing fuel cells as the primary generation and relying on the grid as backup in the event of fuel cell failure would also provide a 2N protection scheme. However, this alternative would provide lower reliability during an earthquake - the design natural disaster for California projects. During an earthquake, it is possible that the natural gas system cannot deliver the fuel to the fuel cells at the same time that the PG&E electrical system is experiencing an outage. In that case, in order to provide the same reliability as the proposed design, emergency backup generators would still be necessary 3N to provide electricity to the CADC during the design natural disaster case. Therefore, in order to have the same reliability, the same number and size of emergency backup generators would be required.

Therefore, the use of fuel cells as primary generation would not replace the proposed emergency backup generators in order to meet the Project Objectives.

Section 9.0 References

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Section 10.0 Agency Contacts and List of Consultants

10.1 Agency Contacts

Bay Area Air Quality District
375 Beale Street, Suite 600
San Francisco, CA 94105

Ariana Husain
Principal Air Quality Engineer
(415) 749-8433
ahusain@baaqmd.gov

City of San José
Planning, Building & Code Enforcement
200 E. Santa Clara Street, 3rd Floor
San José, CA 95113

David Keyon
Principal Planner
Environmental Review
(408) 535-7898
david.keyon@sanJoséca.gov

10.2 Consultants and Preparers

David J. Powers & Associates, Inc.
Environmental Consultants and Planners

Atmospheric Dynamics, Inc.
Air Quality Consultants

Chronicle Heritage
Cultural Resources Consultants

Hexagon Transportation Consultants, Inc.
Transportation Consultants

HMH
Certified Arborist

H. T. Harvey & Associates, Inc.
Biological Resources Consultants

Illingworth & Rodkin, Inc.
Noise and Vibration Consultants

Langan
Geotechnical Consultants

Partner Engineering and Science, Inc.
Hazardous Materials Consultants

Section 11.0 Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
AC	Alternating Current
ACM	asbestos-containing material
AFC	Power Plant Licensing Application for Certification
AI	Artificial Intelligence
Air District	Bay Area Air District
ALUC	Airport Land Use Commission
APN	Assessor Parcel Number
Appendix B	California Code of Regulations Title 20, Division 2, Chapter 5, Appendix B
ATCM	Airborne Toxic Control Measures
BAAD	Bay Area Air District
BACT	Best Available Technology
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
Bay Area	San Francisco Bay Area
bgs	below ground surface
bhp	Brake horsepower
BMP	Best Management Practice
BPIP-PRIME	Plume Rise Model Enhancements to the EPA Building Profile Input Program
Btu	British thermal unit
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CARB	California Air Resources Board

CARE	Community Air Risk Evaluation
CBC	California Building Standards Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CI	Compression Ignition
CIC	Combined Industrial/Commercial
CLUP	Comprehensive Land Use Plan
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalents
Commission	California Energy Commission
Construction General Permit	National Pollutant Discharge Elimination System General Construction Permit
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DC	Data Center
DEF	Diesel Exhaust Fluid
DNL	Day/Night Average Sound Level
dpf	Diesel particulate filter
DPM	Diesel Particulate Matter
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order

EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
EV	Electric Vehicle
FAA	Federal Aviation Administration
Facility	San José/Santa Clara Regional Wastewater Facility
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
General Plan	Envision San José 2040 General Plan
GHG	Greenhouse Gases
GHGRS	Greenhouse Gas Reduction Strategy
GWh	gigawatt hour
GWP	Global Warming Potential
Habitat Plan	Santa Clara Valley Habitat Plan
HAC	Hot Ailse Containment
HCP	Habitat Conservation Plan
HMCD	Santa Clara County Hazardous Materials Compliance Division
HSP	Health and Safety Plan
HSWA	Hazardous and Solid Waste Amendments
HVO	Hydrogenated (or Hydrotreated) Vegetable Oil
ibid	Same source as previous footnote
IGBT	Insulated Gate Bipolar Transistor
IP	Industrial Park
IP(PD)	Industrial Park(Planned Development)
IT	Information Technology
kV	Kilovolt
LBP	lead-based paint
lbs	pounds
LEED	Leadership in Energy and Environmental Design
L_{eq}	Energy-Equivalent Sound/Noise Descriptor
LID	Low Impact Development

L_{max}	Maximum A-weighted noise level during a measurement period
LORS	Laws, Ordinances, Regulations, and Standards
LORS	Laws, Ordinances, Regulations, and Standards
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
MEIR	Maximum Exposed Individual Residential Receptor
MEIS	Maximum Exposed Individual Sensitive Receptor
MEIW	Maximum Exposed Individual Worker Receptor
mgd	Million gallons per day
MLD	Most Likely Descendant
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
mpg	miles per gallon
MRP	Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit
MSL	mean sea level
MTC	Metropolitan Transportation Commission
MVA	Mega Volt-Ampere
MW	Megawatt
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act of 1966
NO_2	Nitrogen Dioxide
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOD	Notice of Determination
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System

NRHP	National Register of Historic Places
NSJFMP	North San José Floodplain Management Policy
NSPS	New Source Performance Standards
NWIC	Northwest Information Center
O_3	Ozone
PCB	polychlorinated biphenyls
PCR	Public Resources Code
PDA	Priority Development Areas
PDM	Project Design Measure
PFC	perfluorocarbon
PG&E	Pacific Gas & Electric Company
PM	particulate matter
PM_{10}	particulate matter with a diameter of 10 microns or less
$PM_{2.5}$	particulate matter with a diameter of 2.5 microns or less
PMI	Point of Maximum Impact
PPV	Peak Particle Velocity
PUE	Power Utilization Efficiency Factor
R&D	Research and Development
RAP	Removal Action Plan
RCRA	Resource Conservation and Recovery Act
ROG	reactive organic gases
RTP	Regional Transportation Plan
RWQCB	San Francisco Bay Regional Water Quality Control Board
SB	State Bill
SCR	Selective Catalytic Reduction
SCS	Sustainable Communities Strategy
SF_6	sulfur hexafluoride
SFBAAB	San Francisco Bay Area Air Basin
SHMA	Seismic Hazards Mapping Act
SJCE	San José Clean Energy
SMARA	Surface Mining and Reclamation Act
SMGB	State Mining and Geology Board

SMP	Site Management Plan
SO_2	Sulfur Dioxide
SO_x	Sulfur Oxides
SPCC	Spill Prevention, Control, and Countermeasure Plan
SPPE	Small Power Plan Exemption
SR	State Route
SRA	State Responsibility Area
STEP	Siting, Transmission and Environmental Protection
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCR	Tribal Cultural Resource
Title 24	Title 24, Part 6 of the California Code of Regulations
tpy	Tons per year
TSCA	Toxic Substances Control Act
UPS	Uninterruptible Power Supply
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGBC	US Green Building Council
Valley Water	Santa Clara Valley Water District
VMT	Vehicle Miles Traveled
VRF	Variable Refrigerant Flow
VTA	Santa Clara Valley Transportation Authority
Williamson Act	California Land Conservation Act
WUI	wildland-urban interface
ZNE	zero net carbon emission

Section 12.0 List of Property Addresses for Notices

To be submitted under a separate coverage.

APPENDIX A

Staff AFC Data Adequacy Worksheets

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. _____ Date: _____

Technical Area: **Air Quality** Project: _____ Technical Staff: _____

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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 OR JUSTIFICATION FOR NOT INCLUDING
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 4.3.2.1: Air Quality Significance Thresholds pages 4.3-14 through 4.3-15. Section 4.3.2.3: Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A		
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.	References relevant to Air Quality analysis are included in the Tables as footnotes or within Section 4.3.2.3 Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48.		

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Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 4.3.1: Environmental Setting pages 4.3-1 through 4.3-2. Section 4.3.2: Impact Discussion pages 4.3-13 through 4.3-50.		
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	N/A		The project does not require a Determination of Compliance from the Bay Area Air District.
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	Appendix F: Air Quality and Greenhouse Gas Emissions Assessment, SubAppendix AQ1 and SubAppendix AQ2		
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Section 4.3.1.2: pages 4.3-9 through 4.3-13. Appendix F: Air Quality and Greenhouse Gas Emissions Assessment, SubAppendix AQ2.		

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Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	N/A		
Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO2, CH4, N2O, and SF6) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.	Section 4.3.2.3: Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48.		
Appendix B (g) (8) (F)(i)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	Appendix F: Air Quality and Greenhouse Gas Emissions Assessment, SubAppendix AQ3.		
Appendix B (g) (8) (F)(ii)	A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests.	N/A		This level of detail is necessary for a CEQA analysis.

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Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.	Section 4.3.2.3: Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48.		
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Section 4.3.2.3: Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48.		
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety.	N/A		

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Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	N/A		
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of:	Section 4.3.2.3: Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48.		
Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM_{10}) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO_x), sulfur dioxide (SO_2), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM_{10}) and particulate matter less than 2.5 microns in diameter (PM2.5) from construction-related equipment;	Section 4.3.2.3: Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48. Appendix F: Air Quality and Greenhouse Gas Emissions Assessment, SubAppendix AQ4.		

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Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NO_x, SO_2, CO, $PM_{10,}$ and $PM_{2.5}$) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions;	Section 4.3.2.3: Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48. Appendix F: Air Quality and Greenhouse Gas Emissions Assessment, SubAppendix AQ3		
Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard; and	Section 4.3.2.3: Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48.		
Appendix B (g) (8) (I) (iv)	An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for $NO_{x,}$ SO_2, CO, PM_{10}, and $PM_{2.5}$.	N/A		
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's impacts under (g)(1), provide the following information:			

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Appendix B (g) (8) (J) (i)	The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and	Section 4.3.2.3: Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48.		
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	N/A		Not required for a CEQA analysis.
Appendix B (g) (8) (K)	A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule.	Section 4.3.2.3. Project Emissions, Air Quality Impact Analysis and Health Risk Assessment pages 4.3-17 through 4.3-48. Section 3.6: Project Design Measures PDM AIR-1 pages 3-21 through 3-22.		
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			For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.

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Technical Area: **Air Quality** Project: _____ Technical Staff: _____

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Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 10.1: page 10-1.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1: Agency Contacts page 10-1.		
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 1.3.1: page 1-4.		

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Technical Area: **Alternatives** Project: _____ Technical Staff: _____

Project Manager:_____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
Appendix B (f) (1)	A discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and an evaluation of the comparative merits of the alternatives. In accordance with Public Resources Code section 25540.6(b), a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site.	Section 8: Alternatives pages 8-1 through 8-11.		The Alternative Analysis focuses on alternative backup generation technology, since the findings necessary for the Commission to grant an SPPE are limited to the thermal power plant and not to the data center and its related facilities. However, to provide information recently requested in other SPPE Proceedings where the Staff is preparing and Environmental Impact Report, the Prologis site selection criteria and a discussion of alternative sites, reduced capacity, reduced acreage and No Project alternatives have been discussed.
Appendix B (f) (2)	An evaluation of the comparative engineering, economic, and environmental merits of the alternatives discussed in (f)(1).	Section 8: Alternatives pages 8-1 through 8-11.		

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Technical Area: **Biological Resources** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

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;	4.4 Biological Resources: referencing and incorporating Arborist Reports and a Biological Resources Evaluation (Appendices G and H), which explain the scope, analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting Regulatory Framework - Section 4.4.1.1 pages 4.4-1 through 4.4-14, Existing Conditions – Section 4.4.1.2 pages 4.4-14 through 4.4-20, an impact discussion consistent with the CEQA Guidelines' list of pertinent questions as described in Section 4.4.2		

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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
		Impact Discussion pages 4.4-21 through 4.4-35.		
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	Arborist Reports and a Biological Resources Evaluation (Appendices G and H).		
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.	Arborist Reports and a Biological Resources Evaluation (Appendices G and H).		
[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).	N/A		
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	4.4.1.2 Existing Conditions pages 4.4-14 through 4.4-20.		

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	measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Arborist Reports and a Biological Resources Evaluation (Appendices G and H). 4.4.2 Impact Discussion pages 4.4-21 through 4.4-34 including measures proposed as Project Design Measures (PDMs) Section 3.6, pages 3-23 through 3-26 and identified APMs for the PG&E facilities in Section 3.7. Section 4.4.2.2 Cumulative Impacts pages 4.4-34 through 4.4-35.		
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 (CNDDB), and a citation which includes the date the CNDDB was accessed. Include a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) showing	Appendix H: Sections, 4 and 5. CNDBB mapping provided as Figures 4 and 5, filed under Request For Confidentiality.		

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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
	sensitive biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan or similar open space land use plan or designation. Label the biological resources and survey areas as well as the project facilities. Sensitive biological resources include:			
Appendix B (g) (13) (A) (i)	species listed under state or federal Endangered Species Acts;	Appendix H: Biological Resources Report, Section 5.		
Appendix B (g) (13) (A) (ii)	species receiving consideration during environmental review under CEQA Guidelines 14 CCR Section 15380;	Appendix H: Biological Resources Report, Section 5.		
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;	Appendix H: Biological Resources Report, Section 5.		
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;	Appendix H: Biological Resources Report, Section 5.		
Appendix B (g) (13) (A) (v)	species and habitats identified by local, state, and federal agencies as needing protection, including but not limited to those identified by the CNDDB, California Fish and Game Code, Title 14 of the California Code of Regulations, or where applicable, in Local Coastal Programs or in relevant decisions of the California	Appendix H: Biological Resources Report, Section 5.		

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	Coastal Commission or other responsible agency;			
Appendix B (g) (13) (A) (vi)	locally significant species that are rare or uncommon in a local context such as county or region or is so designated in local or regional plans, policies, or ordinances;	Appendix H: Biological Resources Report, Section 5.		
Appendix B (g) (13) (A) (vii)	plant species listed as rare under the California Native Plant Protection Act;	Appendix H: Biological Resources Report, Section 5.		
Appendix B (g) (13) (A) (viii)	established native resident or migratory wildlife corridors or wildlife nursery sites.	Appendix H: Biological Resources Report, Section 5.		
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:	Appendix H: Biological Resources Report, Section 5.		
Appendix B (g) (13) (B) (i)	Detailed maps at a scale of 1:6,000 or color aerial photographs taken at a recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under 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 CNDDB, and the	Appendix H: Biological Resources Report, Figure 3.		

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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
	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.			A nitrogen deposition analysis is underway but was not available at the time of the filing of this SPPE Application. It will be provided under separate cover as soon as available.
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	N/A		

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	by the Coastal Act and under the jurisdiction of the California Coastal Commission.			
Appendix B (g) (13) (B) (iv)	Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources.			This information will be transmitted electronically to Staff.
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 4.4.1.2 Existing Conditions pages 4.4-14 through 4.4-20.		
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 H: Biological Resources Report - Table 1, Section 5.2 and Appendix C.		
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			A nitrogen deposition analysis is underway but was not available at the time of the filing of this SPPE Application. It will be provided under separate cover as soon as available.

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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
	status 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 CNDDB 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:	Appendix H: Biological Resources Report, Section 2.		
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.	Appendix H: Biological Resources Report, Section 2.		
Appendix B (g) (13) (D) (ii)	If the project or any related facilities could impact federal or state jurisdictional wetland, provide completed Army Corps of Engineers wetland delineation forms or determination of wetland status pursuant to Coastal Act or CDFW requirements, as applicable to	N/A		

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	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.			
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);	Section 4.4.2 Impact Discussion pages 4.4-21 through 4.4-35.		
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 4.4.2 Impact Discussion pages 4.4-21 through 4.4-35.		
Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources.	Section 4.4.2 Impact Discussion pages 4.4-21 through 4.4-35.		
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.	Section 4.4.2 Impact Discussion pages 4.4-21 through 4.4-35.		

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Appendix B (g) (13) (F) (iii)	Educational programs to enhance employee awareness during construction and operation to protect biological resources.	Section 4.4.2 Impact Discussion pages 4.4-21 through 4.4-35.		
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 4.4.2 Impact Discussion pages 4.4-21 through 4.4-35.		
Appendix B (g) (13) (H)	Submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding whether federal or state permits from other agencies such as the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project.	N/A		
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	4.4.1.1 Regulatory Framework pages 4.4-1 through 4.4-14 contains the level of discussion of relevant federal, state and local statutes and regulations. As identified in Section 1.3.1 page 1-4, the only relevant permits are the permits for the generators by the BAAD and the land use		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.

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		entitlements by the City of San Jose.		
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.	N/A		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1: Agency Contacts, page 10-1.		
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 1.3.1, page 1-4.		

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Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A), 1877(a)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	4.5 Cultural Resources pages 4.5-1 through 4.5-15: referencing and incorporating Confidential Cultural Resources Reports (CRRs) filed under Request For Confidentiality, which explains the scope, analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting (Regulatory Framework - Section 4.5.1.1 pages 4.5-1 through 4.5-6, Existing Conditions – Section 4.5.1.2 pages 4.5-6 through 4.5-9; an impact discussion consistent with the CEQA Guidelines' list of pertinent questions as described in Section 4.5 pages 4.5-9 through 4.5-15.		

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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	CRRs filed under Request For Confidentiality.		
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.	CRRs filed under Request For Confidentiality.		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	4.5.1.2 Existing Conditions pages 4.5-6 through 4.5-9 and CRRs. 4.5.2 Impact Discussion pages 4.5-9 through 4.5-15 including measures proposed as Project Design Measures (PDMs) Section 3.6 pages 3-27 through 3-29. Section 4.5.2.2 Cumulative Impacts pages 4.5-14 through 4.5-15.		
Appendix B (g) (2)	Cultural resources and tribal cultural resources together comprise objects, buildings, structures, sites, features,	CRRs		

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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
	areas, places, records, sacred places, cultural landscapes, or manuscripts, all of which may have significance according to criteria outlined in sections 21074 and 21084.2 of the Public Resources Code.			
Appendix B (g) (2) (A)	A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location. This regional summary must address the potential for buried cultural resources and tribal cultural resources to occur in the project area. The summary, together with literature search results, must inform the field methods employed for identifying cultural resources and tribal cultural resources in the project area.	CRRs		
Appendix B (g) (2) (B)	The results of a literature search to identify cultural resources and tribal cultural resources within an area not less than a 1-mile radius around the project site and not less that than one-quarter (0.25) mile on each side of the linear facilities. Identify any cultural resources or tribal cultural resources listed pursuant to ordinance by a city or county or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources and tribal cultural resources must be completed	CRRs		

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	by, or under the direction of, individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR §4853) shall be provided for all cultural resources and tribal cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5-minute quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided. Copies also shall be provided of all technical reports whose survey coverage is wholly or partly within 0.25 mile of the area surveyed for the project under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.			
Appendix B (g) (2) (C)	The results of new cultural resource and tribal resource surveys or surveys less than 5 years old shall be provided if	CRRs		

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	survey records of the area potentially affected by the project are more than 5 years old. Surveys to identify new cultural resources and tribal cultural resources must be completed by (or under the direction of) individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. New pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending to no less than 200 feet around the project site, substations and staging areas, and to no less than 50 feet to either side of the right-of-way of project linear facility routes. New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than 0.5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field surveys in urban and suburban areas shall be conducted inclusive of the project site, extending no less than one parcel's distance from all proposed plant site boundaries. New historic architecture field reconnaissance			

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	("windshield survey") in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age. A technical report of the results of the new surveys, conforming to the Archaeological Resource Management Report format (CA Office of Historic Preservation Feb 1990), which is incorporated by reference in its entirety, shall be separately provided and submitted (under confidential cover if archaeological resource or other sensitive resource locations are included). Information included in the technical report shall also be provided in the application, other sensitive resources, or areas of religious significance) shall be submitted under a request for confidentiality pursuant to California Code of Regulations, title 20, section 2501 et seq. At a minimum, the technical report shall include:			

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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) (2) (C) (i)	The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B);	CRRs		
Appendix B (g) (2) (C) (ii)	The survey procedures and methodology used to identify cultural and tribal cultural resources and a discussion of the cultural and tribal resources identified by the survey;	CRRs		
Appendix B (g) (2) (C) (iii)	Copies of all new and updated DPR 523(A) forms. If a cultural resource or tribal cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource;	CRRs		
Appendix B (g) (2) (C) (iv)	A map at a scale of 1:24,000 (U.S. Geological Survey topographic quadrangle) depicting the locations of all previously known and newly identified cultural and tribal cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii); and	CRRs – See Results of CHRIS Search.		
Appendix B (g) (2) (C) (v)	The names and qualifications of the cultural resources specialists who contributed to and were responsible for literature searches, surveys, and preparation of the technical report.	CRRs Section 5.		
Appendix B (g) (2) (D) (i)	A copy of the applicant's request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project	CRRs Appendix A.		

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	vicinity, and copies of any correspondence received from the NAHC.			
Appendix B (g) (2) (D) (ii)	A copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Notification to Native Americans shall include a project description and map.	CRRs Appendix B.		
Appendix B (g) (2) (D) (iii)	A written summary of any oral responses.	CRRs Appendix B. Tribal Cultural Section 4.18.2.2 page 4.18-5.		
Appendix B (g) (2) (E)	Include in the discussion of proposed mitigation measures required by (g)(1):	Section 4.5.2.1 Project Impacts page 4.5-10: Proposed Design Measures PDM Cul 1.1 – PDM Cul 2, pages 4.5-11 through 4.5-14 and in Section 3.6 pages 3-27 through 3-29.		
Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural and tribal cultural resources;	Section 4.5.2.1 Project Impacts: Proposed Design Measures PDM Cul 1.1 –Cul 2, pages 4.5-11 through 4.5-14 and in Section 3.6 pages 3-27 through 3-29.		
Appendix B (g) (2) (E) (ii)	A set of contingency measures proposed to mitigate potential impacts to previously unknown cultural and tribal cultural resources and any unanticipated	Section 4.5.2.1 Project Impacts: page 4.5-10: Proposed Design Measures PDM Cul 1.1 – PDM Cul 2, pages 4.5-11 through 4.5-14		

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	impacts to known cultural or tribal cultural resources; and	and in Section 3.6 pages 3-27 through 3-29.		
Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation to protect cultural and tribal cultural resources.	Section 4.5.2.1 PDM Cul 1.1 page 4.5-11 and in Section 3.6, page 3-27.		
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.5.1.1 Regulatory Framework pages 4.5-1 through 4.5-6 contains the level of discussion of relevant federal, state and local statutes and regulations. As identified in Section 1.3 page 1-4, the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if	Section 10.1: Agency Contacts, page 10-1.		

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	known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix 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 1.3.1, page 1-4.		

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Technical Area: **Efficiency, Energy and Energy Resources** Project: _____ Technical Staff: _____

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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 OR JUSTIFICATION FOR NOT PROVIDING
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.	The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting (Regulatory Framework Section 4.6.1.1 pages 4.6-1 to 4.6-3, Existing Conditions Section 4.6.1.2 Existing Conditions pages 4.6-4 to 4.6-5); an impact discussion guided by the CEQA list of pertinent questions as described in Section 4.6.2 pages 4.6-5 to 4.6-11		
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	No major studies or research efforts were undertaken or relied upon to complete the CEQA analysis for Energy and Efficiency.		

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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 4.6.1.1 pages 4.6-1 to 4.6-3 discusses consistency with the City of San Jose Municipal Code, Federal, State and Local standards as well as the Impact Discussion Section 4.6.2 pages 4.6-5 to 4.6-11.		
Appendix B (h) (4) (A)	Heat and mass balance diagrams for design conditions for each mode of operation.	N/A		
Appendix B (h) (4) (B)	Annual fuel consumption in BTUs for each mode of operation, including hot restarts and cold starts.	The annual fuel consumption estimate for testing and maintenance of the backup generators is included 4.6.2.1 Project Impacts page 4.6-8.		
Appendix B (h) (4) (C)	Annual net electrical energy produced in MWh for each mode of operation including starts and shutdowns.	N/A		This information is not necessary to address the CEQA Guidelines questions to determine potential significant impacts
Appendix B (h) (4) (D)	Number of hours the plant will be operated in each design condition in each year.	Section 3.4.9 page 3-8. Prediction of hours of operation during emergencies is extremely rare and cannot be adequately predicted.		CEQA does not require an analysis that is purely speculative. The applicant will provide evidence from PG&E demonstrating that historical emergency outages for the transmission system serving the CADC are extremely rare and after the construction and installation of the PG&E facilities to serve the CADC, the already extremely rare occurrence of outages will be further reduced.

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Appendix B (h) (4) (E)	If the project will be a cogeneration facility, calculations showing compliance with applicable efficiency and operating standards.	N/A the project is not a cogeneration facility.		
Appendix B (h) (4) (F)	A discussion of alternative generating technologies available for the project, including the projected efficiency of each, and an explanation why the chosen equipment was selected over these alternatives.	Section 8.4.3, Alternatives page 8-6 through 8-11.		
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.6.1.1 Regulatory Framework page 4.6-1 through 4.6-3 contain the level of discussion of relevant federal, state and local statutes and regulations applicable to Efficiency and Energy Resources.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits; and therefore, LORS Tables are not provided in this application.
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,	Section 1.3.1 page 1-4.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits; and therefore, LORS Tables are not provided in this application.

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____

Technical Area: **Efficiency, Energy and Energy Resources** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
	regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1 Agency Contacts page 10-1.		
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 1.3.1, page 1-4.		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. _____ Date: _____

Technical Area: **Executive Summary** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
Cal. Code Regs. Tit. 20 § 1704, (a) (4)	Each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation.	Section 10.2		Since there are no evidentiary hearings requiring individual expert testimony for each subject area, the list of preparers of the SPPE Application is not broken out by section.
Appendix B (a) (1) (A)	A general description of the proposed site and related facilities, including the location of the site or transmission routes, the type, size and capacity of the generating or transmission facilities, fuel characteristics, fuel supply routes and facilities, water supply routes and facilities, pollution control systems, and other general characteristics.	Section 1.1 Executive Summary page 1-1. Section 3.0 Project Description: 3.2-3.4 CABGF pages 3-1 through 3-8, 3.5 CADC and PG&E Facilities Description page 3-8 through 3-21.		This information is included in Section 3 of the SPPE Application which is more consistent with the format of a CEQA document
Appendix B (a) (1) (B)	Identification of the location of the proposed site and related facilities by section, township, range, county, and assessor's parcel numbers.	Introduction & Purpose: Section 1.1 Executive Summary page 1-1. Project Information: Sections 2.3 & 2.4: Project Location & APN page 2-1.		Section, Township and Range are not necessary to identify the location of the site in a CEQA document. The APN and site address are sufficient and are provided.
Appendix B (a) (1) (C)	A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings.	Figures- 2.5-1: Regional Map page 2-2. 2.5-2: Vicinity Map page 2-3.		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. _____ Date: _____

Technical Area: **Executive Summary** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
		2.5-3: Aerial & Surrounding Land Use Maps page 2-4.		
Appendix B (a) (1) (D)	A full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction.	N/A		This information is not necessary for Staff to prepare its CEQA document and has not been required for prior data center backup generating facilities SPPE Applications. Project renderings are provided in Appendix B.
Appendix B (a) (1) (E)	In an appendix to the application, a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed powerplant and related facilities. Provide the direct mailing addresses for the owners and occupants of properties contiguous to the proposed power plant, related facilities, transmission lines, or other linear facilities as shown on the latest equalized assessment roll. Provide a map showing the parcels in the notice area.	Section 12, To be submitted under separate cover.		Prologis has requested this information from the City of San Jose, but it was not received by the time of the filing of this SPPE Application. It will be provided as soon as received from the City of San Jose.
Appendix B (a) (2)	Project Schedule: Proposed dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities.	Section 1.3.1 Data Center Facilities page 1-4, and Appendix F, SubAppendix AQ-4.		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. _____ Date: _____

Technical Area: **Executive Summary** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
Appendix B (a) (3) (A)	A list of all owners and operators of the site(s), the power plant facilities, and, if applicable, thermal host, the geothermal leasehold, the geothermal resource conveyance lines, and the geothermal re-injection system, and a description of their legal interest in these facilities.	Section 1.1 Executive Summary page 1-1.		
Appendix B (a) (3) (B)	A list of all owners and operators of the proposed electric transmission facilities.	Section 1.1 Executive Summary page 1-1.		
Appendix B (a) (3) (C)	A description of the legal relationship between the applicant and each of the persons or entities specified in (a)(3)(A) and (B).	Section 1.1 Executive Summary page 1-1.		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ____ Date: _____

Technical Area: **Facility Design** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
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.	N/A		The SPPE Application does not follow the same section format for an AFC. Instead, the SPPE includes the sections required for a legally sufficient CEQA review pursuant to the CEQA Guidelines. Therefore, for the relevant information requested for Facility Design, refer to the Date Completeness Worksheet for Project Description in Section 3.
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A		
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;	N/A		
Appendix B (h) (1) (A)	A description of the site conditions and investigations or studies conducted to determine the site conditions used as the basis for developing design criteria. The descriptions shall include, but not be limited to, seismic and other geologic hazards, adverse conditions that could affect the project's foundation, adverse meteorological and climatic conditions, and flooding hazards, if applicable.	Appendix I, Geotechnical Engineering Report discussed in Section 4.7 page 4.7-1 through 4.7-5; Flooding is addressed in Sections 4.10.1.2 Existing Conditions page 4.10-5 and Section 4.10.2.1 Project Impacts, Subsection c) page 4.10-12 through 4.10-13.		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ____ Date: _____

Technical Area: **Facility Design** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

Appendix B (h) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	N/A		
Appendix B (h) (1) (C)	A description of the proposed foundation types, design criteria (including derivation), analytical techniques, assumptions, loading conditions, and loading combinations to be used in the design of facility structures and major mechanical and electrical equipment.	Foundation types being considered are described in Section 3.5.9: Appendix I, Preliminary Geotechnical Report contains the analyses and recommendations;		The specific foundation design parameters requested is not required for the CEC to perform a CEQA analysis. The final design will be reviewed by the City of San Jose during the building permit process.
Appendix B (h) (1) (D)	For each of the following facilities or systems, provide a description including drawings, dimensions, surface-area requirements, typical operating data, and performance and design criteria for protection from impacts due to adverse site conditions:	N/A		Ibid
Appendix B (h) (1) (D) (i)	The power generation system;	Section 3.2: Generating Facility Description page 3-1.		
Appendix B (h) (1) (D) (ii)	The heat dissipation system;	The Data Center Cooling System is described in Section 3.5.2.2: page 3-10.		
Appendix B (h) (1) (D) (iii)	The cooling water supply system, and, where applicable, pre-plant treatment procedures;	Section 3.4.5 page 3-7 and Section 3.5.10.2 pages 2-19 through 3-20.		Neither the CABGF nor the CADC use water for evaporative cooling. The CADC uses water as described in Section 3.
Appendix B (h) (1) (D) (iv)	The atmospheric emission control system;	Section 3.4.2: Generator System Description page 3-6, Section 4.3.1.2: Air Quality page 4.3-10.		
Appendix B (h) (1) (D) (v)	The waste disposal system and on-site disposal sites;	Section 3.4.6: Waste Management page 3-7, Section 3.5.8.2 Sanitary Sewer Infrastructure page 3-19, Table 3.5-2 page 3-21.		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ____ Date: _____

Technical Area: **Facility Design** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

Appendix B (h) (1) (D) (vi)	The noise emission abatement system;	Appendix L - Noise Analysis, Appendix B, page 55		
Appendix B (h) (1) (D) (vii)	The geothermal resource conveyance and re-injection lines (if applicable);	N/A		
Appendix B (h) (1) (D) (viii)	Switchyards/transformer systems; and	Section 3.5.3: Project Substation page 3-11 and Section 3.5.4: PG&E Trimble Substation Expansion and Transmission Lines switching and Transmission page 3-12 through 3-14.		
Appendix B (h) (1) (D) (ix)	Other significant facilities, structures, or system components proposed by the applicant.	Section 3.5: Project Description: page 3-9.		
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	N/A		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the	N/A		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.

	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.	Section 10.1: Agency Contacts page 10-1.		
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 1.3.1 page 1-4.		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____

Technical Area: **Geological Hazards** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 4.7: Geology and Soils page 4.7-1 referencing and incorporating Preliminary Geotechnical Report in Appendix I, which explains the scope of the field investigation, laboratory analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting Section 4.7.1.1, (Regulatory Framework pages 4.7-1 through 4.7-3, Section 4.7.1.2 Project Component Sites Geologic Conditions page 4.7-3 through 4.5-5); and an impact discussion consistent with the CEQA Guidelines'		

		list of pertinent questions as described in Section 4.7.2 page 4.7-5 through 4.7-12.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.7: Geology and Soils page 4.7-1 referencing and incorporating Geotechnical Report in Appendix I. There are no ongoing research activities underway that were relied upon in this Application.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.7: Geology and Soils Page 4.7-1 referencing and incorporating Geotechnical Report in Appendix I.		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the	Section 4.7.1.2 : Existing Conditions page 4.7-3. Section 4.7.2: Impact Discussion page 4.7-5. Measures proposed as Project Design Measures (PDMs) Section 3.6 pages 3-30 through 3-31. The description of the development of the cumulative setting is contained in Section 4.0: page 4-2 and Table 4.0-1 page 4-3 and cumulative		PDM GEO 2.1 proposes a Worker Environmental Awareness Program (WEAP) for Paleontological Resources (standard language for prior SPPEs). Unlike an AFC CEC Staff does not require a draft of the WEAP in order to support the preparation of its CEQA document. Including the PDM as a Mitigation Measure in the Mitigation, Monitoring and Reporting Plan (MMRP) is sufficient for the CEQA document to conclude that the City of San Jose would enforce the preparation and implementation of the WEAP.

	cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	impacts are addressed in Section 4.7.2.2 page 4.7-12.		
Appendix B (g) (17) (A)	A summary of the geology, seismicity, and geologic resources of the project site and related facilities, including linear facilities.	Section 4.7.1.2: Existing Conditions page 4.7-3 through 4.7-5.		
Appendix B (g) (17) (B)	A map at a scale of 1:24,000 and description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project site and along proposed facilities. Include an analysis of the likelihood of ground rupture, seismic shaking, mass wasting and slope stability, liquefaction, subsidence, tsunami runup, and expansion or collapse of soil structures at the plant site. Describe known geologic hazards along or crossing linear facilities.			This figure will be provided under separate cover.
Appendix B (g) (17) (C)	A map and description of geologic resources of recreational, commercial, or scientific value which may be affected by the project. Include a discussion of the techniques used to identify and evaluate these resources.			This figure will be provided under separate cover.

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____
Technical Area: **Geological Hazards** Project: _____ Technical Staff: _____
Project Manager: _____ Docket: _____ Technical Senior: _____

Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.7.1.1: Regulatory Framework page 4.7-1 through 4.7-2 contains the level of discussion of relevant federal, state and local statutes and regulations. As identified in Section 1.3.1, page 1-41 the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Section 10.1: Agency Contacts page 10-1.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1: Agency Contacts page 10-1.		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____

Technical Area: **Geological Hazards** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

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 1.3.1 page 1-4.		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____

Technical Area: **Hazardous Materials Handling** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 4.9 Hazards and Hazardous Materials page 4.9-1 referencing and incorporating Phase I Environmental Site Assessments (ESA) in Reports in Appendix K, which explains the scope of the field investigation, laboratory analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting (Regulatory Framework Section 4.9.1 page 4.9-1 through 4.9-5, Existing Conditions Section 4.9.1.2 page 4.9-5 through 4.9-8); an impact discussion consistent with the CEQA Guidelines' list of		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____

Technical Area: **Hazardous Materials Handling** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
		pertinent questions as described in Section 4.9.2 pages 4.9-9 through 4,9-18.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.9: Hazards and Hazardous Materials pages 4.9-1 through 4.9-18 referencing and incorporating Phase I Environmental Site Assessments (ESA) in Report in Appendix K. There are no ongoing research activities underway that were relied upon in this Application.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.9 Hazards and Hazardous Materials pages 4.9-1 through 4.9-18 referencing and incorporating Phase I Environmental Site Assessments (ESA) in Report in Appendix K.		
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	Section 4.9.1.2: Existing Conditions pages 4.9-5 through 4.9-8;		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____

Technical Area: **Hazardous Materials Handling** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
	mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 4.9.2: Impact Discussion pages 4.9-9 through 4.9-18; Measures proposed as Project Design Measures (PDMs) Section 3.6: pages 3-30 through 3-33. The description of the development of the cumulative setting is contained in Section 4.0 and Table 4.0-1: page 4-2 and cumulative impacts are addressed in Section 4.9.2.2 page 4.9-18.		
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as defined in California Code of Regulations, title 22, § 66261.20 et seq., and a discussion of the toxicity of each material.	List of hazardous materials on-site during construction and operations in Section 4.9.2.1 page 4.9-11.		
Appendix B (g) (10) (B)	A map at a scale of 1:24,000 depicting the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous materials.	Sensitive receptors used for Public Health modeling purposes are shown in Appendix F, SupAppendix AQ5 Figure AQ-5-1		
Appendix B (g) (10) (C)	A discussion of the storage and handling system for each hazardous material used or stored at the site.	Storage for hazardous materials is addressed in Section 4.9.2.1.: page 4.9-10 through 4.9-12 and		

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____

Technical Area: **Hazardous Materials Handling** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
		Section 3.4.7: pages 3-7 through 3-8.		
Appendix B (g) (10) (D)	The protocol that will be used in modeling potential consequences of accidental releases that could result in off site impacts. Identify the model(s) to be used, a description of all input assumptions, including meteorological conditions. The results of the modeling analysis can be submitted after the application is complete.	N/A		This information is only applicable to hazardous materials subject to the California Accidental Release Prevention (CalARP) Program and that would trigger the requirement for an offsite consequences analysis and a Risk Management Plan (RMP). Neither the SCDC nor the SCBGF store, use or handle hazardous materials subject to CalARP.
Appendix B (g) (10) (E)	A discussion of whether a risk management plan (Health and Safety Code § 25531 et seq.) will be required, and if so, the requirements that will likely be incorporated into the plan.	Section 4.9.2.1, Hazardous Materials, page 4.9-10.		
Appendix B (g) (10) (F)	A discussion of measures proposed to reduce the risk of any release of hazardous materials.	Section 3.6: Project Design Measures page 3-30 through 3-33.		
Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	N/A		
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	Section 4.7.1.1 Regulatory Framework page 4.7-1 contains the level of discussion of relevant federal, state and local statutes and regulations. As identified in Section 1 page 1.3.1, page 1-4 the		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.

DATA ADEQUACY WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____

Technical Area: **Hazardous Materials Handling** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
	construction and operation of the facility is discussed; and	only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 10.1 page 10-1.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1: Agency Contacts page 10-1.		
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 1.3.1 page 1-4.		

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete ____ Revision No. ____ Date: _____

Technical Area: **Land Use** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
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.	The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing Land Use setting (Section 4.11.1.1, Regulatory Framework page 4.11-1, Section 4.11.1.2 Existing Conditions page 4.11-1 and 4.11-2); an impact discussion guided by the CEQA list of pertinent questions as described in Section 4.11.2 page 4.11-2.		
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	No major studies or research efforts were undertaken or relied upon to complete the CEQA analysis for Land Use.		
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	Section 4.11.2.1 Land Use page 4.11-1 discusses consistency with the City of		

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	relevance of each such reference;	San Jose General Plan and Municipal Code, the Santa Clara Valley Habitat Plan and whether the project is compatible with the Comprehensive Land Use Plans for the two relevant airports in the region.		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 4.11.1.1 and 4.11.1.2 Land Use Regulatory Framework and Existing Conditions pages 4.11-1 through 4.11-2. Section 4.11.2 Land Use Impact Discussion pages 4.11-2 through 4.11-4. No measures to mitigate impacts were proposed as Project Design Measures because no significant impacts requiring mitigation were identified.		
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	Section 4.11.1.2 Land Use Existing Conditions page 4.11-1.		

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	within one-quarter mile of any project-related linear facilities. Include:			
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;	Section 4.11.1.2 Land Use Existing Conditions page 4.11-1 through 4.11-2.		
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;	None.		
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	None.		
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.	This map will be provided under seperate cover.		

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Appendix B (g) (3) (B)	A discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans and policies adopted by any federal, state, regional, or local planning agencies. The discussion shall identify the need, if any, for land use decisions by another public agency or as part of the commission's decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations.	Land Use Sections: 4.11.1.2 Existing Conditions pages 4.11-1 through 4.11-2. 4.11.2.1 Project Impacts page 4.11-2 through 4.11-4.		
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	Section 4.11.1.2 Land Use Existing Conditions pages 4.11-1 through 4.11-2.		

	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:	Section 4.2 pages 4.2-1 through 4.2-5 discusses agricultural resources and since the project will not affect any agricultural land no map was provided.		
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;	Section 4.2.1.2: Existing Conditions pages 4.2-1 through 4.2-2.		
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	Section 4.2.2.1: Project Impacts pages 4.2-4 through 4.2-5.		
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	Section 4.2.2.1: Project Impacts pages 4.2-4 through 4.2-5.		

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	and a discussion of the status of the expiration or canceling of such contract.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.11.1.1 Land Use Regulatory Framework page 4.11-1 and Agriculture Section 4.2.1.1 page 4.2-1 contain the level of discussion of relevant federal, state and local statutes and regulations applicable to Land Use and Agricultural Resources. As identified in Section 1.3.1 page 1-4, the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
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.			For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official	Section 10.1 Agency Contacts page 10-1.		

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	who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
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 1.3.1 page 1-4.		

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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.	4.7 Geology & Soils page 4.7-1 referencing the Geotechnical Investigation Report in Appendix I, which explains the scope of the field investigation, laboratory analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting (Regulatory Framework Section 4.7.1.1 pages 4.7-1 through 4.7-3 and Existing Conditions Section 4.7.1.2 page 4.7-3); an impact discussion consistent with the CEQA Guidelines' list of pertinent questions as described in		

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		Section 4.7.2 pages 4.7-5 through 4.7-12.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.7 Geology & Soils page 4.7-1 referencing the Geotechnical Investigation Report in Appendix I. There are no ongoing research activities underway that were relied upon in this Application.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.7 Geology & Soils page 4.7-1 referencing the Geotechnical Investigation Report in Appendix I.		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Section 3.6: Project Design Measures PDM GEO-2.1 & GEO-2.2 Paleontological WEAP & Stop Work pages 3-29 through 3-30. Section 4.7.2.1 & 4.7.2.2 Project Impacts pages 4.7-6 through 4.7-12.		

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	other adopted local, regional, or statewide plan.			
Appendix B (g) (16) (A)	Identification of the physiographic province and a brief summary of the geologic setting, formations, and stratigraphy of the project area. The size of the paleontological study area may vary depending on the depositional history of the region.	Section 4.7 Geology & Soils page 4.7-1 referencing the Geotechnical Investigation Report in Appendix I.		
Appendix B (g) (16) (B)	A discussion of the sensitivity of the project area described in subsection (g)(16)(A) and the presence and significance of any known paleontological localities or other paleontological resources within or adjacent to the project. Include a discussion of sensitivity for each geologic unit identified on the most recent geologic map at a scale of 1:24,000. Provide rationale as to why the sensitivity was assigned.	4.7.1.2 Geology and Soils , Existing Conditions page 4.7-5.		
Appendix B (g) (16) (C)	A summary of all local museums, literature searches and field surveys used to provide information about paleontological resources in the project area described in (g)(16)(A). Identify the dates of the surveys, methods used in completing the surveys, and the names and qualifications of the individuals conducting the surveys.	Section 4.7 Geology & Soils page 4.7-1 referencing the Geotechnical Investigation Report in Appendix I.		
Appendix B (g) (16) (D)	Information on the specific location of known palaeontologic resources, survey	A map was not available at the time of filing of this		A map has not been required for previous data center backup generating facility SPPE

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	reports, locality records, and maps at a scale of 1:24,000, showing occurrences of fossil finds, if known, within a 1-mile radius of the project and related facilities shall be included in a separate appendix to the Application and submitted to the Commission under a request for confidentiality, pursuant to California Code of Regulations, title 20, section 2501 et seq.	SPPE Application. The map is being prepared and will be submitted under a Request For Confidentiality.		Applications in the past. However, Prologis has agreed to prepare and provide this map which will be submitted under a Request For Confidentiality once completed.
Appendix B (g) (16) (E)	A discussion of any educational programs proposed to enhance awareness of potential impacts to paleontological resources by employees, measures proposed for mitigation of impacts to known palaeontologic resources, and a set of contingency measures for mitigation of potential impacts to unknown paleontological resources.	PDMs: GEO-2.1 WEAP for Paleontological Resources and GEO-2.2: Stop Work for Paleontological Resources Section 3.7 pages 3-28 through 3-29.		
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	4.7.1.1 Regulatory Framework pages 4.7-1 through 4.7-3 contains the level of discussion of relevant federal, state and local statutes and regulations. As identified in Section 2 page 2-1, the only relevant permits are the permits for the generators by the BAAD and the land use		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.

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		entitlements by the City of San Jose.		
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 10.1 page 10-1.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1 Agency Contacts page 10-1.		
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 1.3.1 page 1-4.		

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Appendix B (b) (1)	In a section entitled, "Generation Facility Description, Design, and Operation" provide:	Section 3.2 Generating Facility Description, Construction and Operation page 3-1.		
Appendix B (b) (1) (A)	Maps at a scale of 1:24,000 (1" = 2000'), (or appropriate map scale agreed to by staff) along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number, showing the proposed final locations and layout of the power plant and all related facilities;	Figures: 2.5-1 Regional Map page 2-2. 2.5-2 Vicinity Map page 2-3. 2.5-3 Aerial and Surrounding Land Use Map, page 2-4.		
Appendix B (b) (1) (B)	Scale plan and elevation drawings depicting the relative size and location of the power plant and all related facilities to establish the accuracy of the photo simulations required in sections (a)(1)(D) and (g)(6)(F);	Appendix B: CADC Development Permit Site Plan Package.		Photo simulations not required, see Visual Resources DA Worksheet.
Appendix B (b) (1) (C)	A detailed description of the design, methods of construction (include depth of excavations and other ground disturbances) and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	Section 3.2 through Section 3.4 pages 3-1 through 3-8. Section 3.5 CADC Facilities Description pages 3-8 through 3-20.		

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Appendix B (b) (1) (D)	A description of how the site and related facilities were selected, and the consideration given to engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, electric transmission constraints, and other factors considered by the applicant.	Section 8		
Appendix B (b) (2)	In a section titled, "Transmission Lines Description, Design, and Operation" provide:	Section 3.5.3 Project Substation page 3-10. Section 3.5.4 PG&E Trimble Substation Expansion and Transmission and IT Communication Lines page 3-13. Figures: 3.5-1 Proposed Project Components page 3-14 3.5-2 Proposed Trimble Substation Location page 3-15 page 3.5-3 Proposed Transmission Line Routes from the Trimble Substation Expansion to the CABGF/CADC page 3-16.		The SPPE Application does not include a section titled "Transmission Lines Description, Design and Operation" in order to avoid confusion. This SPPE Application is for the backup generating facility (CABGF) which does not include transmission lines because the generators are not interconnected to the transmission grid. The data center (CADC) is served by transmission lines and utility facilities, which are outside the permitting jurisdiction of the CEC because these facilities are not "related facilities" to the CABGF. The transmission lines and facilities that are being constructed by PG&E to serve the CADC are described in Section 3.5.4 in order to support Staff's CEQA analysis.
Appendix B (b) (2) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) of each proposed transmission line	Figures: 3.5-1 Proposed Project Components page 3-14		

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	route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s);	3.5-2 Proposed Trimble Substation Location page 3-15 page 3.5-3 Proposed Transmission Line Routes from the Trimble Substation Expansion to the CABGF/CADC page 3-16.		
Appendix B (b) (2) (B)	A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.			As described in the Visual Resources DA Worksheet, visual simulations are not required for Staff's CEQA analysis.
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights-of-way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.	Section 3.5.3 Project Substation page 3-10. Section 3.5.4 PG&E Trimble Substation Expansion and Transmission Lines pages 3-11 through 3-16.		The SPPE Application does not include a section titled "Transmission Lines Description, Design and Operation" in order to avoid confusion. This SPPE Application is for the backup generating facility (CABGF) which does not include transmission lines because the generators are not interconnected to the transmission grid. The data center (CADC) is served by transmission lines and utility facilities, which are outside the permitting jurisdiction of the CEC because these facilities are not "related facilities" to the CABGF. The transmission lines and facilities that are being constructed by PG&E to serve the CADC are described in

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				Section 3.5.4 in order to support Staff's CEQA analysis.
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints; and	N/A		The SPPE Application does not include a section titled "Transmission Lines Description, Design and Operation" in order to avoid confusion. This SPPE Application is for the backup generating facility (CABGF) which does not include transmission lines because the generators are not interconnected to the transmission grid. The data center (CADC) is served by transmission lines and utility facilities, which are outside the permitting jurisdiction of the CEC because these facilities are not "related facilities" to the CABGF. The transmission lines and facilities that are being constructed by PG&E to serve the CADC are described in Section 3.5.4 in order to support Staff's CEQA analysis.
Appendix B (b) (2) (E)	A completed System Impact Study or signed System Impact Study Agreement with the California Independent System Operator and proof of payment. When not connecting to the California Independent System Operator controlled grid, provide the executed System Impact Study agreement and proof of payment to the interconnecting utility. If the interconnection and operation of the proposed project will likely impact a transmission system that is not	N/A		The CABGF does not interconnect to the electric transmission grid and therefore this request is not applicable

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	controlled by the interconnecting utility (or California Independent System Operator), provide evidence of a System Impact Study or agreement and proof of payment (when applicable) with/to the impacted transmission owner or provide evidence that there are no system impacts requiring mitigation.			
Appendix B (b) (3)	Applications for geothermal facilities shall contain the following additional information:	N/A		
Appendix B (b) (3) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) showing the location of the geothermal leaseholds, along with a description by section, township, range, county, and assessor's parcel numbers of the leaseholds;	N/A		
Appendix B (b) (3) (B)	Full-page color photographic reproductions of the geothermal leaseholds;	N/A		
Appendix B (b) (3) (C)	A description of the process by which the geothermal leasehold was selected and the consideration given to engineering constraints, site geology, environmental impacts, water, steam, waste and fuel constraints, electric transmission constraints, and any other factors considered by the applicant. Include references to any environmental documents which address steam field development;	N/A		

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Appendix B (b) (3) (D)	A detailed description of the type, quality, and characteristics of the geothermal resource, including pressure and temperature flow rates, constituents and concentrations of non-condensable gases, and constituent concentrations of dissolved solids, and descriptions and concentrations of any substances potentially harmful to public health and safety or to the environment;	N/A		
Appendix B (b) (3) (E)	Proposed locations of production and re-injection wells for the project. Include the applicant's assessment of geothermal resource adequacy, including the production history of those wells within the leaseholds dedicated to the project, including pressure decline curves as available; and	N/A		
Appendix B (b) (3) (F)	A discussion of the potential impacts on the temperature, mineral content, and rate of flow of thermal springs affected by the project.	N/A		
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	N/A		This requirement is applicable to AFCs and not required for the CEQA analysis performed for an SPPE.

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Technical Area: **Public Health** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

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.	4.3 Air Quality page 4.3-1 referencing and incorporating Air Quality Analyses in Appendix F, which explains the scope of the field investigation, laboratory analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting (Section 4.3.1 Environmental Setting pages 4.3-1 through 4.3-9, Section 4.3.1.2 Regulatory Framework 4.3-9 through 4.3-13); an impact discussion consistent with the CEQA Guidelines' list of pertinent questions as described in Section 4.3.2 pages 4.3-13 through 4.3-16.		Public Health is not a technical subject that is required for a legally sufficient CEQA analysis. The public health analysis for the backup generators is addressed in Section 4.3 Air Quality. Therefore, references will be to those Sections.

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Technical Area: **Public Health** Project: _____ Technical Staff: _____

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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	4.3 Air Quality page 4.3-1 referencing and incorporating Air Quality Analyses in Appendix F. There are no ongoing research activities underway that were relied upon in this Application.		
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;	4.3 Air Quality page 4.3-1 referencing and incorporating Air Quality Analyses in Appendix F.		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	4.3.1 Environmental Setting pages 4.3-1 to 4.3-13. 4.3.3 Impact Discussion pages 4.3-9 through 4.3-11. Measures proposed as Project Design Measures (PDMs) PDM AIR-1, pages 3-20 through 3-21.		

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Appendix B (g) (9) (A)	An assessment of the potential risk to human health from the project's hazardous air emissions using the Air Resources Board Hotspots Analysis and Reporting Program (HARP) (Health and Safety Code §§44360-44366) or its successor and Approved Risk Assessment Health Values. These values should include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005).	Air Quality 4.3.2.3 pages 4.3-17 through 4.3-48 Appendix F, Subappendix AQ-5		
Appendix B (g) (9) (B)	A listing of the input data and output results, in both electronic and print formats, used to prepare the HARP health risk assessment.	Air Quality Section 4.3.3.4 page 4.3-37 through 4.3-47. Appendix F: Subappendix AQ5.		
Appendix B (g) (9) (C)	Identification of available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases.	Table 4.3-6 pages 4.3-15. Air Quality Section 4.3.3 Impact Discussion pages 4.3-37 through 4.3-47.		
Appendix B (g) (9) (D)	A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).	Appendix F: Sub Appendix AQ5, Figure AQ 5-1.		

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Appendix B (g) (9) (E)	For this section, the following definitions apply:	Section 4.3: Air Quality Section 4.3.1 Environmental Setting pages 4.3-1 through 4.3-8, Section 4.3.3 Impact Discussion pages 4.3-13 through 4.3-47, and Air Quality Analyses in Appendix F.		
Appendix B (g) (9) (E) (i)	A sensitive receptor refers to infants and children, the elderly, and the chronically ill, and any other member of the general population who is more susceptible to the effects of the exposure than the population at large;	Section 4.3: Air Quality Section 4.3.1 Environmental Setting pages 4.3-1 through 4.3-8, Section 4.3.3 Impact Discussion pages 4.3-13 through 4.3-47, and Air Quality Analyses in Appendix F.		
Appendix B (g) (9) (E) (ii)	An acute exposure is one that occurs over a time period of less than or equal to one (1) hour; and	Section 4.3: Air Quality Section 4.3.1 Environmental Setting pages 4.3-1 through 4.3-8, Section 4.3.3 Impact Discussion pages 4.3-13 through 4.3-47, and Air Quality Analyses in Appendix F.		
Appendix B (g) (9) (E) (iii)	A chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years.	Section 4.3: Air Quality Section 4.3.1 Environmental Setting pages 4.3-1 through 4.3-8, Section 4.3.3 Impact Discussion pages 4.3-13 through 4.3-47, and Air		

		Quality Analyses in Appendix F.		
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.3.2 Regulatory Background Framework pages 4.3-9 through 4.3-13 contains the level of discussion of relevant federal, state and local statutes and regulations. As identified in Section 1.3.1, page 1-4 the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 10.1 page 10-1.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each	Section 10.1 Agency Contacts page 10-1.		

	agency, and provide the name of the official who will serve as a contact person for Commission staff.			
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 1.3.1 page 1-4.		

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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 OR JUSTIFICATION FOR NOT PROVIDING
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.	N/A		Reliability is not a technical subject that is required for a legally sufficient CEQA analysis. The reliability of the data center and its backup generating technology is a key factor in the Project Objectives and therefore is discussed in the context of Section 1 Executive Summary and Section 8, Alternative generation technology.
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A		
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;	N/A		
Appendix B (h) (3) (A)	A discussion of the sources and availability of the fuel or fuels to be used over the estimated service life of the facilities.	Section 4.6 Energy, page 4.6-5 through 4.6-8.		
Appendix B (h) (3) (B)	A discussion of the anticipated service life and	N/A		

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	degree of reliability expected to be achieved by the proposed facilities on consideration of:			
Appendix B (h) (3) (B) (i)	Expected overall availability factor, and annual and lifetime capacity factors;	N/A		
Appendix B (h) (3) (B) (ii)	The demonstrated or anticipated feasibility of the technologies, systems, components, and measures proposed to be employed in the facilities, including the power generation system, the heat dissipation system, the water supply system, the reinjection system, the atmospheric emission control system, resource conveyance lines, and the waste disposal system;	N/A		
Appendix B (h) (3) (B) (iii)	Geologic and flood hazards, meteorologic conditions and climatic extremes, and cooling water availability;	Geology and Soils Sections 4.7.2.1, pages 4.7-7 through 4.7-10, and Hydrology and Water Quality Section 4.10.2.1, pages 4.10-9 through 4.10-15.		
Appendix B (h) (3) (B) (iv)	Special design features adopted by the applicant or resource supplier to ensure power plant reliability including equipment redundancy; and	N/A		

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Appendix B (h) (3) (B) (v)	For technologies not previously installed and operated in California, the expected power plant maturation period.	N/A		
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	N/A		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
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	N/A		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.

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	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.	Section 10.1: Agency Contacts page 10-1.		
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 1.3.1 page 1-4.		

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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 OR JUSTIFICATION FOR NOT PROVIDING
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.	The SPPE does not include a section specifically for Socioeconomics. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. Additionally, there is a Section for Environmental Justice which addresses similar topics. This includes a description of the existing setting (Environmental Justice Regulatory Framework Section 4.21.1.1 and Existing Conditions Section 4.21.1.2 pages 4.21-1 through 4.21-10 and an impact discussion consistent with the CEQA Guidelines' list of pertinent questions as described in Section 4.21.2 pages 4.21-10 to 4.21-14.		There are multiple Data Completeness Worksheets the Commission reviews for an AFC that are not required in a CEQA analysis. Some of the requested AFC information is addressed in different SPPE sections. These can include: Population and Housing Section 4.14, Public Services Section 4.15, Recreation Section 4.16, and Environmental Justice Section 4.21.
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	There are no ongoing research activities underway that were relied upon in this Application.		Research efforts that were relied upon for Socioeconomics are specified in the footnotes of various SPPE sections including: Population and Housing

	provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and			Section 4.14, Public Services Section 4.15, Recreation Section 4.16, and Environmental Justice Section 4.21.
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 9.0 References page 9-1 and footnotes throughout the SPPE.		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	This information is contained in the following CEQA portions of various SPPE sections including: Population and Housing Section 4.14; Public Services Section 4.15, Recreation Section 4.16 and Environmental Justice Section 4.21		
Appendix B (g) (7) (A)	A description of the socioeconomic circumstances of the vicinity and region affected by construction and operation of the project. Include:	Section 5.0: Growth Inducing Impacts page 5-1 and Section 4.21.1.2: Environmental Justice page 4.21-4.		

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Appendix B (g) (7) (A) (i)	The economic characteristics, including the economic base, fiscal resources, and a list of the applicable local agencies with taxing powers and their most recent and projected revenues;	N/A		This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities.
Appendix B (g) (7) (A) (ii)	The social characteristics, including population and demographic and community trends;	Section 4.14: Population and Housing Section 4.14.1.2 Existing Conditions page 4.14-4. Section 4.21 Figure 4.21-1 page 4.21-5, Figure 4.21-2 page 4.21-6, Figure 4.21-3 page 4.21-7, Figure 4.21-4 page 4.21-9.		
Appendix B (g) (7) (A) (iii)	Existing and projected unemployment rates;	Section 4.21 Environmental Justice page 4.21-4.		This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities. However, unemployment is a factor used in the CalEnviro Screening analysis in Section 4.21.
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by occupation required for construction and operation of the project;	Section 4.14: Population and Housing, Impact Discussion 4.14.2 pages 4.14-3 through 4.14-4.		.
Appendix B (g) (7) (A) (v)	Availability of temporary and permanent housing and current vacancy rate; and	Section 4.14.2.1: Population and Housing Project Impacts, pages 4.14-3 to 4.14-4.		
Appendix B (g) (7) (A) (vi)	Capacities, service standards, existing and expected use levels, and planned expansion of utilities (gas, water, and waste) and public	Section 4.15: Public Services pages 4.15-3 through 4.15-7. Section 4.16: Recreation		

	services, including fire protection, law enforcement, emergency response, medical facilities, other assessment districts, school districts, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information for each school district shall include current enrollment and yearly expected enrollment by grade level groupings, excluding project-related changes for the duration of the project schedule.	pages 4.16-2 through 4.16-4. Section 4.19: Utilities and Service Systems pages 4.19-7 through 4.19-14.		
Appendix B (g) (7) (B)	A discussion of the socioeconomic impacts caused by the construction and operation of the project (note year of estimate, model, if used, and appropriate sources), including:			This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities.
Appendix B (g) (7) (B) (i)	An estimate of the number of workers to be employed each month by occupation during construction, and for operations, an estimate of the number of permanent operations workers during a year;	Section 3.4.9: CABGF Facility Operation page 3-8. Section 3.5.2 CADC page 3-9		This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities.
Appendix B (g) (7) (B) (ii)	An estimate of the percentage of non-local workers who will relocate to the project area to work during the project construction and operation;	Population and Housing Sections 4.14.2.1 and 4.14.2.2 Project Impacts pages 4.14-3 through 4.14-4.		

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Appendix B (g) (7) (B) (iii)	An estimate of the potential population increase caused directly and indirectly by the project;	Population and Housing Sections 4.14.2.1 and 4.14.2.2 Project Impacts pages 4.14-3 through 4.14-4.		
Appendix B (g) (7) (B) (iv)	The potential impact of population increase on housing during the construction and operations phases;	Population and Housing Sections 4.14.2.1 and 4.14.2.2: Project Impacts pages 4.14-3 through 4.14-4.		
Appendix B (g) (7) (B) (v)	The potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information on schools shall include project-related enrollment changes by grade level groupings and associated facility and staffing impacts by school district during the construction and operating -phases;	Section 4.15.1.2: Public Services Existing Conditions page 4.15-3 and Section 4.15.2.1: Project Impacts pages 4.15-5 through 4.15-7.		

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Appendix B (g) (7) (B) (vi)	An estimate of applicable school impact fees;	N/A		This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities.
Appendix B (g) (7) (B) (vii)	An estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees;	N/A		This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities.
Appendix B (g) (7) (B) (viii)	An estimate of the expenditures for locally purchased materials for the construction and operation phases of the project;	N/A		This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities.
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost (plant and equipment) of the project;	N/A		This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities.
Appendix B (g) (7) (B) (x)	An estimate of sales taxes generated during construction and separately during an operational year of the project;	N/A		This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities.
Appendix B (g) (7) (B) (xi)	An estimate of property taxes generated during an operational year of the project;	N/A		This level of detailed information is not required for a legally sufficient CEQA review and has not been requested in previous SPPE Applications for data center backup generating facilities.
Appendix B (g) (7) (B) (xii)	The expected direct, indirect, and induced income and employment effects due to construction and operation of the project; and	N/A		

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Appendix B (g) (7) (B) (xiii)	A discussion of impacts to environmental justice populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations.	Section 4.21.2 Environmental Justice Impacts Discussion pages 4.21-10 through 4.21-14.		
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	As identified in Section 1.3.1 page 1-4, the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose. As mentioned earlier, there are multiple SPPE sections that address Socioeconomics, and the Regulatory Framework in each of these sections could be appropriate and contain the level of discussion of relevant federal, state and local statutes and regulations. These Sections could include: Population and Housing Section 4.14 page 4.14-1, Public Services Section 4.15 page 4.15-1, Recreation Section 4.16 page 4.16-1, and Environmental Justice Section 4.21 page 4.21-1.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
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	Section 10.1 page 10-1.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.

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	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.	Section 10.1 Agency Contacts page 10-1.		
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 1.3.1 page 1-4.		

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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.	4.7 Geology & Soils page 4.7-1 referencing the Geotechnical Investigation Report in Appendix I, which explains the scope of the field investigation, laboratory analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting (Regulatory Framework Section 4.7.1.1 pages 4.7-1 through 4-7.3 and Existing Conditions Section 4.7.1.2 page 4.7-3 through 4.7-5); an impact discussion consistent with the CEQA Guidelines' list of pertinent questions as described in Section 4.7.2.1 page 4.7-6 through 4.7-12.		

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Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.7: Geology & Soils page 4.7-1 referencing the Preliminary Geotechnical Investigation Report in Appendix I. There are no ongoing research activities underway that were relied upon in this Application.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.7: Geology & Soils page 4.7-1 referencing the Preliminary Geotechnical Investigation Report in Appendix I.		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or	Section 4.7.1.2: Existing Conditions pages 4.7-3 through 4.7-5. Section 4.7.2: Impact Discussion pages 4.7-5 through 4.7-12. Measures proposed as Project Design Measures (PDMs) Section 3.6, pages 3-28 through 3-29. The description of the development of the cumulative setting is		

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	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.	contained in Section 4.0; Tables 4.0-1 page 4-3, the Preliminary Geotechnical Investigation Report in Appendix I and cumulative impacts are addressed in Section 4.7.2.2: page 4.7-12.		
Appendix B (g) (15) (A)	A map at a scale of 1:24,000 and written description of soil types and all agricultural land uses that will be affected by the proposed project. The description shall include:	Preliminary Geotechnical Investigation Report in Appendix I. Section 4.7.1.2: Existing Conditions pages 4.7-3 through 4.7-5.		
Appendix B (g) (15) (A) (i)	The depth, texture, permeability, drainage, erosion hazard rating, and land capability class of the soil;	Preliminary Geotechnical Investigation Report in Appendix I. Section 4.7.1.2: Existing Conditions pages 4.7-3 through 4.7-5.		
Appendix B (g) (15) (A) (ii)	An identification of other physical and chemical characteristics of the soil necessary to allow an evaluation of soil erodibility, permeability, re-vegetation potential, and cycling of	Preliminary Geotechnical Investigation Report in Appendix I. Section 4.7.1.2: Existing Conditions pages 4.7-3 through 4.7-5.		

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	pollutants in the soil-vegetation system;			
Appendix B (g) (15) (A) (iii)	The location of any proposed fill disposal or fill procurement (borrow) sites; and	Preliminary Geotechnical Investigation Report in Appendix I.		
Appendix B (g) (15) (A) (iv)	The location of any contaminated soils that could be disturbed by project construction.	Preliminary Geotechnical Investigation Report in Appendix I. Section 4.9.1.2: Hazardous Materials Existing Conditions page 4.9-5 through 4.9-8 and Phase I ESAs Appendix K.		
Appendix B (g) (15) (B)	An assessment of the effects of the proposed project on soil resources and agricultural land uses. This discussion shall include:	Section 4.2.2: Agriculture and Forestry Resources Impact Discussion pages 4.2-3 through 4.2-5.		
Appendix B (g) (15) (B) (i)	The quantification of accelerated soil loss due to wind and water erosion; and	Section 4.7.2: Geology and Soils Impact Discussion page 4.7-5 through 4.7-12.		
Appendix B (g) (15) (B) (ii)	The effect of power plant emissions on surrounding soil-vegetation systems.	Preliminary Geotechnical Investigation Report in Appendix I.		
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local,	4.7.1.1 Regulatory Framework pages 4.7-1 through 4.7-3 contains the		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and

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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 OR JUSTIFICATION FOR NOT PROVIDING
	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	level of discussion of relevant federal, state and local statutes and regulations. As identified in Section 1.3.1 page 1-4, the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		therefore LORS Tables are not provided in this application.
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.	As identified in Section 1.3.1 page 1-4, the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was	Section 10.1 Agency Contacts page 10-1.		

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	contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
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 1.3.1 page 1-4.		

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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 OR JUSTIFICATION FOR NOT PROVIDING
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 4.17 Transportation Page 4.17-1 referencing and incorporating Transportation Analysis in Appendix M, which explains the scope, analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions including those specifically relate to Vehicle Miles Traveled (VMT). This includes a description of the existing setting (Regulatory Framework - Section 4.17.1.1 pages 4.17-1 through 4.17-4, Existing Conditions – Section 4.17.1.2 pages 4.17-4 through 4.17-7); an impact discussion consistent with the CEQA Guidelines' list of pertinent questions as described in Section 4.17.2.1 pages 4.17-7 through 4.17-14.		

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Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.17 Transportation page 4.17-1 referencing and incorporating Transportation Analysis in Appendix M. There are no ongoing research activities underway that were relied upon in this Application.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.17 Transportation 4.17-1 referencing and incorporating Transportation Analysis in Appendix M.		
Appendix B (g) (1)	…provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 4.17.1.2 Existing Conditions pages 4.17-4 through 4.17-7. Section 4.17.2.1 Impact Discussion page 4.17-7 through 4.17-14. Section 3.6 Measures proposed as Project Design Measures (PDMs) pages 3-36 and 3-37. Cumulative Impacts – Section 4.17.2.2 pages 4.17-13 through 4.17-14. Section 4.17 Transportation page 4.17-1 referencing and incorporating Transportation Analysis in Appendix M.		PDM TRN-1.1: proposes a Transportation Demand Management (TDM) Plan. Unlike an AFC, CEC Staff does not require a draft of the TDM in order to support the preparation of its CEQA document. Including the PDM as a Mitigation Measure in the Mitigation, Monitoring and Reporting Plan (MMRP) is sufficient for the CEQA document to conclude that the City of San Jose would enforce the preparation and implementation of the TDM.

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Appendix B (g) (5) (A)	A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan.	Appendix M, Figure 3.		
Appendix B (g) (5) (B)	If the proposed project including any linear facility is to be located within four miles of an airport, a planned or proposed airport runway, or an airport runway under construction, discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace, specifically any potential to obstruct or impede air navigation generated by the project during construction or operation; such as, a thermal plume, a visible water vapor plume, glare, electrical interference, or surface structure height. The discussion should include:	Section 4.9 Hazardous Materials Section 4.9.2.1 page 4.9-17.		
Appendix B (g) (5) (B) (i)	A map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the airport influence area including all safety zones, and the proposed power plant site and related facilities.	Appendix M, Transportation Analysis, Figure 1		

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Appendix B (g) (5) (B) (ii)	A thermal plume analysis that describes the plume's velocity;	N/A		
Appendix B (g) (5) (B) (iii)	A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and			
Appendix B (g) (5) (B) (iv)	Copies of FAA Form 7460-1, Notice of Proposed Construction or Alteration, that were submitted or approved for any project component requiring notice.	Prologis has commissioned the filing of FAA Form 7460-1 for the facilities and will provide them under separate cover		
Appendix B (g) (5) (C)	An evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include:	VMT is addressed in the Transportation Analysis as provided in Appendix M. Additionally, it is included in the following:Regulatory Framework Section 4.17.1.1 page 14.17-1, Project Impacts Section 4.17.2.1 pages 14.17-7 through 4.17-14.		
Appendix B (g) (5) (C) (i)	The local jurisdiction's thresholds of significance;	Project Impacts Section 4.17.2.1 page 4.17-9.		
Appendix B (g) (5) (C) (ii)	Methodologies (such as local VMT Evaluation Tool);	VMT is addressed in the Transportation Analysis as provided in Appendix M.		
Appendix B (g) (5) (C) (iii)	VMT heat maps; and	VMT is addressed in the Transportation Analysis as provided in Appendix M.		
Appendix B (g) (5) (C) (iv)	Transportation demand management plans and any documents supporting the project applicant's CEQA determination.	VMT is addressed in the Transportation Analysis as provided in Appendix M. Additionally, the Transportation Demand Management Plan is a		PDM TRN-1.1: proposes a Transportation Demand Management (TDM) Plan. Unlike an AFC, CEC Staff does not require a draft of the TDM in order to support the preparation of its CEQA document. Including the PDM as a Mitigation Measure

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		proposed measure: PDM TRN-1 page 3-35 through 3-36.		in the Mitigation, Monitoring and Reporting Plan (MMRP) is sufficient for the CEQA document to conclude that the City of San Jose would enforce the preparation and implementation of the TDM.
Appendix B (g) (5) (D)	An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area affected by or serving the proposed facility. For each road identified, include the following, where applicable:	Appendix M, Transportation Analysis, Figures 3, 4 5, and 9		CEQA no longer requires a level of service traffic analysis and therefore any analysis that may be required by the City of San Jose will be associated solely with the implementation of their LORS and therefore unnecessary for the CEC CEQA analysis.
Appendix B (g) (5) (D) (i)	Road classification and design capacity;	N/A		Ibid
Appendix B (g) (5) (D) (ii)	Current daily average and peak traffic counts;	N/A		Ibid
Appendix B (g) (5) (D) (iii)	Current and projected levels of service before project development, during construction, and during project operation;	N/A		Ibid
Appendix B (g) (5) (D) (iv)	Weight and load limitations;	N/A		Ibid
Appendix B (g) (5) (D) (v)	Estimated percentage of current traffic flows for passenger vehicles and trucks; and	N/A		Ibid
Appendix B (g) (5) (D) (vi)	An identification of any road features affecting public safety.	N/A		Ibid
Appendix B (g) (5) (E)	An assessment of the construction and operation	Transportation Analysis as provided in Appendix M.		

	impacts of the proposed project on the transportation facilities identified in (g)(5)(D). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(D). Include:			
Appendix B (g) (5) (E) (i)	Estimated one-way trip lengths for workers, deliveries, and truck haul trips generated by the construction of the project.	Transportation Analysis as provided in Appendix M.		
Appendix B (g) (5) (E) (ii)	Description of public roadways and intersections temporarily or permanently altered by construction and operation including the duration of activities.	Transportation Analysis as provided in Appendix M.		
Appendix B (g) (5) (F)	A discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.	Transportation Analysis as provided in Appendix M.		
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land	Section 4.17.1.1 Regulatory Framework, page 4.17-1 contains the level of discussion of relevant federal,		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local

	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	state and local statutes and regulations. As identified in Section 1.3.1 page 1-4, the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 10.1, Agency Contacts page 10-1.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1: Agency Contacts, page 10-1.		
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has	Section 1.3.1, page 1-4.		

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	taken or plans to take to obtain such permits.			

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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 OR JUSTIFICATION FOR NOT PROVIDING
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.	N/A		This section is not required for a legally sufficient CEQA analysis. As described in Sections 1 and 3, the CABGF will only interconnect to the onsite CADC. While the CADC will require a Project Substation, and PG&E serving facilities, those facilities are described in Section 3 in sufficient detail for a CEQA analysis to be performed.
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A		
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.	N/A		
Appendix B (h) (2) (A)	A discussion of the need for the additional electric transmission lines, substations, or other equipment, the basis for selecting principal points of junction with the existing electric transmission system, and the capacity and voltage levels of the proposed lines, along with the basis for selection of the capacity and voltage levels.	Section 3.5.3 Project Substation page 3-10. Section 3.5.4 PG&E Trimble Substation Expansion and Transmission Lines pages 3-11 through 3-16.		

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Appendix B (h) (2) (B)	A discussion of the extent to which the proposed electric transmission facilities have been designed, planned, and routed to meet the transmission requirements created by additional generating facilities planned by the applicant or any other entity.	N/A		
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights of way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.	N/A		The level of detail requested is not required for a CEQA analysis.
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints.	N/A		The route and transmission facilities serve the data center and were selected by PG&E and not the Applicant and therefore, this information is within the scope of a third party and not available to the Applicant.
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	N/A		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.

	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			
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.			For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1: Agency Contacts page 10-1.		
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 1.3.1 page 1-4.		

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Technical Area: **Transmission System Safety and Nuisance** Project: _____ Technical Staff: _____

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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 OR JUSTIFICATION FOR NOT PROVIDING
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.	N/A		This section is not required for a legally sufficient CEQA analysis and the backup generating facility is interconnected only to the data center.
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A		
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.	N/A		
Appendix B (g) (1)	…provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other	N/A		

	adopted local, regional, or statewide plan.			
Appendix B (g) (18) (A)	The locations and a description of the existing switchyards and overhead and underground transmission lines that would be affected by the proposed project.	N/A		
Appendix B (g) (18) (B)	An estimate of the existing electric and magnetic fields from the facilities listed in (A) above and the future electric and magnetic fields that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also provide an estimate of the radio and television interference that could result from the project.	N/A		
Appendix B (g) (18) (C)	Specific measures proposed to mitigate identified impacts, including a description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce electric and magnetic field levels.	N/A		
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 thex but could 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	N/A		

	construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A		
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.	N/A		
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A		

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Technical Area: **Visual Resources** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

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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.	The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting (Section 4.1.1.1, Regulatory Framework, page 4.1-1, Section 4.1.1.2 Existing Conditions, page 4.1-2); and an impact discussion guided by the CEQA list of pertinent questions as described in Section 4.1.2, pages 4.1-6 through 4.1-10.		
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	No major studies or research efforts were undertaken of relied upon to complete the CEQA analysis for Land Use.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents,	Section 4.1.2.1: page 4.1-6.		

	along with brief discussions of the relevance of each such reference;			
Appendix B (g) (1)	... provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation, and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection (or a combination of) used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 4.1.1.2: Existing Conditions page 4.1-2. Section 4.1.2: Impact Discussion page 4.1-6. Section 4.1.2.1: Project Impacts (d) page 4.1-9. Section 4.0: page 4-1 and Table 4.0-1: page 4-3. No measures to mitigate impacts were proposed as Project Design Measures because no significant impacts requiring mitigation were identified.		
Appendix B (g) (6) (A)	Provide a description of the existing landscape (built or natural) where the proposed project is to be sited and the vicinity, and along the proposed routes for any aboveground project-related linear facilities. Include:	Section 4.1.1.2: Existing Conditions page 4.1-2.		
Appendix B (g) (6) (A) (i)	Show on a map(s) (pinpoint) any designated or recognized scenic vista and scenic resource within a five-mile radius of the project and	Figures and pages below:		

	one-mile radius of a project-related linear facility. Include:			
Appendix B (g) (6) (A) (i) a.	Any designated scenic vista and scenic resource in an adopted federal, state, county, or city government planning document, plan, or regulation.	Section 4.1.1.2: Existing Conditions – Scenic View & Corridors pages 4.1-3 through 4.1-4.		
Appendix B (g) (6) (A) (i) b.	A natural feature or object that is a part of the land, such as a geologic distinguishing characteristic (e.g., laccolith), geomorphologic feature (e.g., gorge), or other terrain feature (e.g., a water body, open space, or a tree recognized for its aesthetic, botanical and ecological value, or age, rarity, and size).	Section 4.1.2.1: Project Impacts pages 4.1-6 through 4.1-10.		
Appendix B (g) (6) (A) (i) c.	A man-made feature or object that embodies elements of architecture or engineering design, detail, materials or craftsmanship that represent a significant innovation or is unique, such as the California State Capitol, Golden Gate Bridge, or Hollywood Sign.	Section 4.1.2.1: Project Impacts pages 4.1-6 through 4.1-10.		
Appendix B (g) (6) (A) (i) d.	Explain does the project eliminate or obstruct the public view (the visible area from a location where the public has a legal and physical right of access to real property) of a scenic vista and scenic resource? Is the project situated so that it changes the visual	Section 4.1.1.2: Existing Conditions – Scenic View & Corridors pages 4.1-3 through 4.1-4.		

	aspect of a scenic resource by being different or in sharp contrast?			
Appendix B (g) (6) (A) (ii)	Describe the existing nighttime lighting on the project site and in the vicinity.	Section 4.1.1.2: Existing Conditions – Light & Glare pages 4.1-4.		
Appendix B (g) (6) (B)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within an "urbanized area" as defined in Public Resources Code section 21071, explain the project's conformance with the city/county General Plan, and city municipal code or county government code (e.g., zoning) governing scenic quality.	Section 4.1.1.2: Existing Conditions Surrounding Uses pages 4.1-3. Section 4.1.2.1: Project Impacts page 4.1-6.		
Appendix B (g) (6) (C)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within a non-urbanized area provide the following:	Not Applicable. Project would be developed in an urbanized area. Section 4.1.2.1: Project Impacts Urbanized Area c) page 4.1-8.		
Appendix B (g) (6) (C) (i)	Show on a map the pinpoint location of the key observation point(s) (KOP) for the project. A KOP is a fixed position in a publicly accessible location where a public view of the project is analyzed and/or evaluated in the landscape.	N/A		

	Objects of aesthetic significance are the primary focus in the KOP selection.			
Appendix B (g) (6) (C) (ii)	If an object of aesthetic significance is not in the vicinity of the project, a KOP is to be selected based on importance to stakeholders, visibility, direct public selection, worst-case scenario, or other reason. Explain the reason the KOP was chosen. At a minimum two KOPs are to be selected.	N/A		
Appendix B (g) (6) (C) (iii)	Provide a color photograph(s) showing an actual line of sight at eye level during daytime and clear weather from the KOP to the project site prior to any alteration (existing condition). The photographer at the KOP is to use a standard lens. For each photograph provide the following information: camera type, lens focal length, viewing angle; date and time the photograph was taken, and the distance to the project site.	N/A		
Appendix B (g) (6) (C) (iv)	Using the photograph from the KOP provide a spatially accurate and realistically photo manipulated computer simulated image of the project (photo-realistic simulation) one-year after completion of	N/A		

	construction (existing condition plus proposed project).			
Appendix B (g) (6) (C) (v)	The KOP photograph and the photo-realistic simulation are to be capable of 11" x 17" color print by a printer capable at a minimum 600 dots per inch output resolution.	N/A		
Appendix B (g) (6) (C) (vi)	Provide a copy of the KOP photograph(s) and photo-realistic simulation(s) in an electronic file.	N/A		
Appendix B (g) (6) (D)	Show and describe the project in the landscape.	Appendix B.		
Appendix B (g) (6) (D) (i)	Provide an 8.5" x 11" sized scaled elevation(s) of project buildings, structures, and major equipment; a table listing their dimensions (height, length, width, diameter).	Appendix B.		
Appendix B (g) (6) (D) (ii)	Provide a table and description of the exterior surface treatments and finishes for the buildings, structures, major equipment (e.g., colors, flat and/or textured finishes), and structural materials.			This level of detail is not necessary for a CEQA level of analysis and therefore is not provided.
Appendix B (g) (6) (D) (iii)	Describe project specific architectural treatment or design technique mitigation unique to the project's siting at the location (e.g., camouflage, disguise, screen), if any.			This level of detail is not necessary for a CEQA level of analysis and therefore is not provided.
Appendix B (g) (6) (D) (iv)	Provide a project specific conceptual landscape design plan that conforms with the city	Appendix B.		

	municipal code or county government code. Include:			
Appendix B (g) (6) (D) (iv) a.	the type of plant and/or tree species, location, quantity, size, spacing at installation/planting, expected growth rates, and expected heights at one-year, five years, and maturity. Specify irrigation system components and show their locations.			
Appendix B (g) (6) (D) (iv) b.	the calculated total pervious surface amount for the project site; include the surface to be replaced, the new surface, and the total area to be landscaped.	Section 4.10.2.1: Hydrology page 4.10-9 through 4.10-12 describes how compliance with Provision C.3 of the MRP, enforced by the City of San Jose, will ensure the project will not create new sources of polluted runoff. Appendix B.		
Appendix B (g) (6) (D) (v)	Provide a project specific conceptual outdoor lighting control and management plan (lighting plan) and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code.	Section 4.1.2.1: Light or Glare pages 4.1-6 through 4.1-10.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore compliance with the City of San Jose Municipal Code is not necessary for the CEC's CEQA document. The CEC can simply rely on the City of San Jose enforcing its LORS related to lighting at the time of the issuance of building permits.
Appendix B (g) (6) (D) (v) a.	Provide a list of the project-specific luminaires, identify the design (e.g., full cutoff, semi cutoff, non cutoff) and indicate if	N/A		This level of detail is not necessary for the CEC to conduct its CEQA analysis. The CEC can simply rely on the City of San Jose

	the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the project-specific luminaires locations on a diagram or elevation.			enforcing its LORS related to lighting at the time of the issuance of building permits.
Appendix B (g) (6) (D) (v) b.	Describe reflectance, the intensity of the specular reflectance from the exterior surface of the project's large buildings, structures, and major equipment offsite to the surrounding area (e.g., the light reflected from the shiny surface). The reflectance of the object–how bright it shines–depends on the intensity of the light striking it and the materials from which it is made (e.g., glass, reinforced concrete, structural steel).	N/A		This level of detail is not necessary for the CEC to conduct its CEQA analysis. The CEC can simply rely on the City of San Jose enforcing its LORS related to lighting at the time of the issuance of building permits.
Appendix B (g) (6) (E)	If the project is to use a cooling tower emitting a publicly visible water vapor plume (visible plume) in the atmosphere provide the following information:	N/A		
Appendix B (g) (6) (E) (i)	Provide the cooling tower's number of fan cells, the fan cell stack height and diameter, the exhaust mass flow rate, heat rejection rate, and exhaust temperature.	N/A		

Completeness: Complete ___ Incomplete ___ **DATA ADEQUACY WORKSHEET** Revision No. ____ Date: _____

Technical Area: **Visual Resources** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

Appendix B (g) (6) (E) (ii)	Provide fogging curves specific to the cooling tower's exhaust discharge for at least three ambient air temperature conditions (a low, average, and high temperature condition).	N/A		
Appendix B (g) (6) (E) (iii)	Explain if the project's forecasted visible plume emitted in the atmosphere by the cooling tower would eliminate or obstruct an existing public view of a designated or recognized scenic vista, scenic resource, and the existing visual character or quality of public views of the site and its surroundings.	N/A		
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	N/A		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and	Section 1.3 page 1-3.		For an SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local

	approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.			permits and therefore LORS Tables are not provided in this application.
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 also provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1 Agency Contacts page 10-1.		

DATA ADEQUACY WORKSHEET

Technical Area: **Waste Management** Project: _____ Technical Staff: _____
Project Manager: _____ Docket: _____ Technical Senior: _____

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.	N/A		Waste Management is not a technical subject that is required for a legally sufficient CEQA analysis. The waste management for the data center and its backup generating technology are addressed in the Sections for Utilities & Service Systems 4.19 pages 4.19-1 through 4.19-14, and Public Services Section 4.15 pages 4.15-1 to 4.15-7. Therefore, references will be to those Sections.
Cal. Code Regs., tit. 20, § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A		
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;	N/A		
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	Public Services Section 4.15: Existing Conditions 4.15.1.2 pages 4.15-3 through 4.15-4. Impact Discussion 4.15.2 pages 4.15-4 through 4.15-7.		

	measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Utilities & Service Systems Section 4.19: Existing Conditions 4.19.1.2 pages 4.19-5 through 4.19-7. Impact Discussion 4.19.2 pages 4.19-7 through 4.19-14.		
Appendix B (g) (12) (A)	A Phase I Environmental Site Assessment (ESA) for the proposed power plant site using methods prescribed by the American Society for Testing and Materials (ASTM) document entitled "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process" (Designation: E 1527-93, May 1993), which is incorporated by reference in its entirety; or an equivalent method agreed upon by the applicant and the CEC Staff that provides similar documentation of the potential level and extent of site contamination. The Phase I ESA shall have been completed no earlier than one year prior to the filing of the application.	Phase I Environmental Site Assessments (ESA) in Report in Appendix K, which explain the scope of the field investigation, laboratory analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions.		
Appendix B (g) (12) (B)	A description of each waste stream estimated to be generated during project construction and operation, including origin, hazardous or nonhazardous classification pursuant to Title 22, California Code of	Section 4.19.2.1: Solid Waste Impact Discussion 4.19-7. Section 4.9.2: Hazards and Hazardous Materials Impact		

	Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.	Discussion pages 4.9-9 through 4.9-16.		
Appendix B (g) (12) (C)	A description of all waste disposal sites which may feasibly be used for disposal of project wastes. For each site, include the name, location, classification under California Code of Regulations, Title 23, section 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site.	Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-8 through 4.19-14.		
Appendix B (g) (12) (D)	A description of management methods for each waste stream, including methods used to minimize waste generation, length of on- and off-site waste storage, re-use and recycling opportunities, waste treatment methods used, and use of contractors for treatment.	Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-8 through 4.19-14.		
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	Section 4.19: Utilities & Service Systems Regulatory Framework pages 4.19-1 through 4.19-5 and Section 4.15: Public Service, pages 4.15-1 through 4.15-4 contains the level of discussion of relevant federal,		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.

	explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	state and local statutes and regulations. As identified in Section 2: page 2-1, the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 10.1: Agency Contacts page 10-1.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1: Agency Contacts page 10-1.		
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 1.3.1: page 1-4.		

DATA ADEQUACY WORKSHEETS

Completeness: Complete ___ Incomplete ___ Revision No.___ Date: _____

Technical Area: **Water Resources** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	AFC INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS JUSTIFICATION FOR NOT PROVIDING AFC
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 4.10: Hydrology & Water Quality pages 4.10-1 through 4.10-15 referencing and incorporating Phase I Environmental Site Assessments (ESA) in Report in Appendix K, which explains the scope of the field investigation, laboratory analyses, literature research relied upon, and conclusions and recommendations. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting (Regulatory Framework Section 4.10.1.1 pages 4.10-1 through 4.10-5, and Existing Conditions Section 4.10.1.2 pages 4.10-5 through 4.10-8); an impact discussion consistent with the CEQA Guidelines' list of pertinent questions as		

		described in Section 4.10.2 pages 4.10-8 through 4.10-15.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.10: Hydrology and Water Quality pages 4.10-1 through 4.10-15, referencing and incorporating Phase I Environmental Site Assessments (ESA) in Report in Appendix K. There are no ongoing research activities underway that were relied upon in this Application.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.10: Hydrology and Water Quality pages 4.10-1 through 4.10-15 referencing and incorporating Phase I Environmental Site Assessments (ESA) in Report in Appendix K.		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or	Section 4.10.1.2: Existing Conditions pages 4.10-5 through 4.10-8; Section 4.10.2 Impact Discussion pages 4.10-9 through 4.10-15; Measures proposed as Project Design Measures (PDMs) PDM HYD-1.1 pages 3-34 through 3-35. The description of the development of the		

	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.	cumulative setting is contained in Section 4.0 and Tables 3.5-1 & 3.5-2 on pages 3-20 through 3-21 and cumulative impacts are addressed in Section 4.10.2.2 on page 4.10-15. Section 4.19.1.1: Utilities and Service Systems Regulatory Framework pages 4.19-1 through 4.19-5.		
Appendix B (g) (14) (A)	All the information required to apply for the following permits, if applicable, including:			The SPPE does not follow the same format as an AFC. Instead, the SPPE includes the sections required for a legally sufficient CEQA review pursuant to the CEQA Guidelines. The cumulative impacts section 4.10.2 addresses this request. All necessary permits will be addressed and obtained at a local level.
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);	Section 4.10.2: Hydrology and Water Quality Project Impacts pages 4.10-9 through 4.10-15.		
Appendix B (g) (14) (A) (ii)	Construction and Industrial Waste Discharge or Industrial Pretreatment permits from wastewater treatment agencies;	Section 4.10.2: Hydrology and Water Quality Project Impacts pages 4.10-9 through 4.10-15.		
Appendix B (g) (14) (A) (iii)	Nationwide Permits and/or Section 404 Permits from the U.S. Army Corps of Engineers; and	Section 4.10.2: Hydrology and Water Quality Project Impacts pages 4.10-9 through 4.10-15.		

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.	Section 4.10.2: Hydrology and Water Quality Project Impacts pages 4.10-9 through 4.10-15.		
Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The 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:	Section 4.10.1.2: Hydrology and Water Quality Existing Conditions pages 4.10-5 through 4.10-8.		The inclusion of a large scale map of water bodies is not necessary for a legally sufficient CEQA analysis and has not been required for prior data center backup generating facilities SPPE Applications. The project has identified that it will use minimal water for the data center supplied by the City of San Jose public water system and will discharge minimal wastewater into the City of San Jose municipal wastewater system.
Appendix B (g) (14) (B) (i)	Ground water bodies and related geologic structures;	Section 4.10: Hydrology and Water Quality Section 4.10.1.2: Existing Conditions pages 4.10-5 through 4.10-8. Section 4.10.2: Project Impacts pages 4.10-9 through 4.10-15. The Project will not alter the course of a stream or river since no waterways are on-site.		
Appendix B (g) (14) (B) (ii)	Surface water bodies;	Section 4.10: Hydrology and Water Quality Section 4.10.1.2: Existing Conditions pages 4.10-5		

		through 4.10-8. Section 4.10.2: Project Impacts pages 4.10-9 through 4.10-15. The Project will not alter the course of a stream or river since no waterways are on-site.		
Appendix B (g) (14) (B) (iii)	Water inundation zones, such as the 100-year flood plain and tsunami run-up zones;	Section 4.10: Hydrology and Water Quality Section 4.10.1.2: Existing Conditions pages 4.10-5 through 4.10-8. Section 4.10.2: Project Impacts pages 4.10-9 through 4.10-15. The Project is outside of the 100-year flood plain and there are no bodies of water that would affect the site in the event of a tsunami.		
Appendix B (g) (14) (B) (iv)	Flood control facilities (existing and proposed); and	Section 4.10.1.2: Hydrology and Water Quality Existing Conditions pages 4.10-5 through 4.10-8. Section 3.5.7: Project Description Stormwater		

		Controls pages 3-18 through 3-19.		
Appendix B (g) (14) (B) (v)	Groundwater wells within ½ mile if the project will include pumping.	N/A. The project will not include groundwater wells.		
Appendix B (g) (14) (C)	A description of the water to be used and discharged by the project. This information shall include:	Section 4.10.2.1: Hydrology & Water Quality Project Impacts pages 4.10-9 through 4.10-15. Section 4.19.1.2: Utilities and Service Systems Existing Conditions pages 4.19-5 through 4.19-7.		
Appendix B (g) (14) (C) (i)	Source(s) of the primary and back-up water supplies and the rationale for their selection;	Section 4.10.2.1: Hydrology & Water Quality Project Impacts pages 4.10-9 through 4.10-15. Section 4.19: Utilities and Service Systems Section 4.19.1.2 Existing Conditions pages 4.19-5 through 4.19-7; Section 4.19.2.1 Project Impacts pages 4.19-8 through 4.19-14.		
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 variation, provide seasonal ranges of	N/A		The level of detail requested is not necessary for a legally sufficient CEQA analysis and has not been required for prior data center backup generating facilities SPPE Applications. The project has identified that it will use minimal water for the data center supplied by the City of San Jose public water system and will discharge

	the expected physical and chemical characteristics. Provide copies of background material used to create this description (that is, laboratory analysis);			minimal wastewater into the City of San Jose municipal wastewater system. The project will not have an industrial water discharge.
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;	Section 4.10.2.1: Hydrology & Water Quality Project Impacts pages 4.10-9 through 4.10-15. Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-8 through 4.19-14. Section 3.4.5: Project Description page 3-7.		
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;	Section 4.10.2.1: Hydrology & Water Quality Project Impacts pages 4.10-9 through 4.10-14. Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-8 through 4.19-14. Section 3.5.7: Project Description Stormwater Controls and Features page 3-18. Section 3.5.8: Utility Interconnections page 3-19.		A water balance diagram is not necessary for a CEQA analysis.
Appendix B (g) (14) (C) (v)	For all water supplies intended for industrial uses to be provided from	N/A		The amount of water used by the data center is minimal, provided by a municipal

	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 assurances from the water purveyor to serve the project;			utility and does not trigger a Water Supply Assessment nor the requirement for will serve letter.
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);	Section 4.10.2.1: Hydrology & Water Quality Project Impacts pages 4.10-9 through 4.10-15. Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-8 through 4.19-14.		The amount of water used by the data center is minimal, provided by a municipal utility and does not trigger a Water Supply Assessment nor the requirement for will serve letter and is not necessary for a CEQA analysis.
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.	Section 4.10.2.1: Hydrology & Water Quality Project Impacts pages 4.10-9 through 4.10-15.		Water mass balance and heat balance diagram is not necessary for a CEQA analysis and has not been required for prior data center backup generating facilities SPPE Applications.

	Highlight any water conservation measures on the diagram and the amount that they reduce water demand; and	Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-8 through 4.19-14.		
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 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. 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	Most likely wastewater/storm water entity at Section 4.19.1.2: Utilities and Service Systems Existing Conditions pages 4.19-5 through 4.19-7. Section 4.10.2.1: Hydrology & Water Quality Project Impacts pages 4.10-9 through 4.10-15.		The amount of wastewater discharged by the data center is minimal, will consist of sanitary sewage and discharge similar to any office building into the municipal utility's sanitary sewer and does not trigger the need for will serve letter for a CEQA analysis. The project will not have an industrial water discharge.

	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.			
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;	Section 4.19.1.2: Utilities and Service Systems Existing Conditions pages 4.19-5 through 4.19-7. Section 4.10.2.1: Hydrology & Water Quality Project Impacts pages 4.10-9 through 4.10-15.		This level of detail is not necessary for a CEQA analysis.
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;	Section 4.10: Hydrology & Water Quality Section 4.10.1.2: Existing Conditions pages 4.10-5 through 4.10-8. Section 4.10.2.1: Project Impacts pages 4.10-9 through 4.10-15. Section 4.19: Utilities and Service Systems Section 4.19.1.2: Existing Conditions pages 4.19-5 through 4.19-7.		

		Section 4.19.2.1: Project Impacts pages 4.19-8 through 4.19-14.		
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			This level of detail is not necessary for a CEQA analysis and has not been required for prior data center backup generating facilities SPPE Applications.
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 4.10 Hydrology and Water Quality: Section 4.10.1.1: Regulatory Framework page 4.10-1. Section 4.10.2.1 Project Impacts pages 4.10-9 through 4.10-15. Section 4.19 Utilities and Service Systems: Section 4.19.1.1: Regulatory Framework pages 4.19-1 through 4.19-5. Section 4.19.2.1: Project Impacts pages 4.19-8 through 4.19-14.		
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:	Section 4.10.2.1: Hydrology and Water Quality Project Impacts pages 4.10-9 through 4.10-15. Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-8 through 4.19-14.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (g) (14) (E) (i)	The effects of project demand on the water supply and other users of	Section 4.10.2.1: Hydrology and Water Quality Project		

	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;	Impacts pages 4.10-9 through 4.10-15. Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-8 through 4.19-14.		
Appendix B (g) (14) (E) (ii)	If the project will pump groundwater, an estimation of aquifer drawdown based on a 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;	N/A		Project will not be pumping groundwater.
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;	Section 4.10.2.1: Hydrology and Water Quality Project Impacts pages 4.10-9 through 4.10-15. Project Design Measures: PDM HYD-1.1 Stormwater Best Management Practices pages 3-34 through 3-35.		

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		The backup generating facility does not use water and the data center will employ air-cooled chillers.
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;"	N/A		The backup generating facility does not use water and the data center will employ air-cooled chillers.
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	Section 4.10.2.1: Hydrology and Water Quality Project Impacts pages 4.10-9 through 4.10-15. Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-7 through 4.19-14.		
Appendix B (g) (14) (vii)	All assumptions, evidence, references, and calculations used in the analysis to assess these effects.	Section 4.10.2.1: Hydrology and Water Quality Project Impacts pages 4.10-9 through 4.10-15.		

		Section 4.19.2.1: Utilities and Service Systems Project Impacts pages 4.19-7 through 4.19-14.		
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.10.1.1: Hydrology and Water Quality Regulatory Framework pages 4.10-1 through 4.10-5 contains the level of discussion of relevant federal, state and local statutes and regulations. As identified in Section 3.2.1: Site Description page 3-1, the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 10.1: page 10-1.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each	Section 10.1: Agency Contacts page 10-1.		

	agency, and provide the name of the official who will serve as a contact person for Commission staff.			
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 1.3.1: page 1-4.		

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete ___ Revision No. ___ Date: _____

Technical Area: **Wildfire** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS OR JUSTIFICATION FOR NOT PROVIDING
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.	The methodology employed for evaluating the potential adverse effects resulting from the Project include application of long standing CEQA principles and the CEQA list of pertinent questions. This includes a description of the existing setting (Section 4.20 Wildfire Regulatory Framework - Section 4.20.1.1 pages 4.20-1 through 4.20-3, Existing Conditions - Section 4.20.1.2 page 4.20-3); and an impact discussion guided by the CEQA list of pertinent questions as described in Impact Section 4.20.2 pages 4.20-3 through 4.20-4.		
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	No major studies or research efforts were undertaken or relied upon to complete the CEQA analysis for Wildfire.		

	the project (including expected completion dates; and			
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.20.1.1: Wildfire Regulatory Framework pages 4.20-1 through 4.20-3		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 4.20: Wildfire Section 4.20.1.2: Regulatory Framework and Existing Conditions & Regulatory Framework pages 4.20-1 through 4.20-3. Section 4.20.2: Impact Discussion pages 4.20—3 through 4.20-4. No measures to mitigate impacts were proposed as Project Design Measures because no significant impacts requiring mitigation were identified.		
Appendix B (g) (19) (A)	A map showing State Responsibility Areas (SRA,) as defined in Public Resources Code section 4102, relative to the proposed project.	N/A		
Appendix B (g) (19) (B)	A map showing state Fire Hazard Severity Zones, as defined in 14 CCR section 1280.01, relative to the proposed project.	N/A		

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Technical Area: **Wildfire** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

Appendix B (g) (19) (C)	If the project would be in the vicinity of an SRA or a Very High Fire Hazard Severity Zone, as defined in 14 CCR section 1265.00, provide:	Section 4.20.1.2: Wildfire Existing Conditions page 4.20-3.		
Appendix B (g) (19) (C) (i)	Local emergency response or evacuation plans and a description of how the proposed project could influence their effectiveness.	Section 4.20.2.1: Wildfire Project Impacts page 4.20-4.		
Appendix B (g) (19) (C) (ii)	A discussion of how potential project pollutants could be contained onsite during a wildfire event.	Section 4.9.2.1: Hazards and Hazardous Materials Project Impacts page 4.9-8. Section 3.4.7: Hazardous Materials Management page 3-7.		
Appendix B (g) (19) (C) (iii)	A description of infrastructure that would be built or maintained (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate the risk of wildfire.	Not Applicable. However, the Wildfire cumulative impacts are addressed in Section 4.20.2.2: page 4.20-4.		
Appendix B (g) (19) (C) (iv)	Describe people or structures downslope or downstream of the proposed project that could be impacted by flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	Not Applicable. However, the Wildfire cumulative impacts are addressed in Section 4.20.2.2 page 4.20-4.		

DATA ADEQUACY WORKSHEET

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Technical Area: **Worker Safety** Project: _____ Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

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.	The SPPE does not include a section specifically for Worker Safety. The methodology employed for evaluating the potential adverse effects resulting from the project include application of long standing CEQA principles and the CEQA list of pertinent questions. Additionally, there is a Section Hazards and Hazardous Materials which addresses similar topics. This includes a description of the existing setting (Regulatory Framework Section 4.9.1.1 pages 4.9-1 through 4.9-5 and an impact discussion consistent with the CEQA Guidelines' list of pertinent questions as described in Section 4.9.2 pages 4.9-9 through 4.9-18.		CEQA does not require an analysis of Worker Safety. The only CEQA related areas that would also provide information related to the safety of workers or worker training are: Section 4.9 Hazards and Hazardous Materials, Section 4.3 Air Quality, Section 4.4 Biological Resources, and Section 4.5 Cultural Resources (related to Worker Environmental Awareness Program).
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.9: Hazards and Hazardous Materials page 4.9-1 referencing and incorporating Phase I Environmental Site Assessments (ESA) in Report in Appendix K.		

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		There are no ongoing research activities underway that were relied upon in this Application.		
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 4.9: Hazards and Hazardous Materials pages 4.9-10 through 4.9-16 referencing and incorporating Phase I Environmental Site Assessments (ESA) in Report in Appendix K.		
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 4.9 Hazards and Hazardous Materials: Section 4.9.1.2: Existing Conditions pages 4.9-5 through 4.9-8; Section 4.9.2: Impact Discussion pages 4.9-9 through 4.9-18; Measures proposed as Project Design Measures (PDMs) page 3-31 through 3-34. The description of the development of the cumulative setting is contained in Section 4.0 page 4-1,and Table 4.0-1 page 4-3 and cumulative impacts are addressed in Section 4.9.2.2 page 4.9-18.		

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Appendix B (g) (11) (A)	A description of the safety training programs that will be required for construction and operation personnel.	Project Design Measures (PDM): PDM HAZ-1.2 page 3-31, plus Worker Environmental Awareness Programs for Biology PDM BIO-2.6 page 3-24, Cultural PDM CUL-1.1 page 3-27.		
Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.	Section 3.4.3: Fuel System page 3-6. Fuel Suppression: Section 4.15 : Public Services page 4.15-3; Section 4.20 : Wildfire pages 4.20-1, 4.20-2, and 4.20-4 ; PG&E Programmatic Measures page 3-56.		CEQA does not require an analysis of fire suppression. However the project's evaluation of its potential effects on Wildfire and Public Services are provided in Sections 4.15 Public Services and 4.20 Wildfire.
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	Project Design Measures HAZ-2.2 Health and Safety Plan (HSP) pages 3-33 through 3-34.		Unlike an AFC, CEC Staff does not require a draft of the Construction Health and Safety Program Plans in order to support the preparation of its CEQA document. Including the Plan as a Mitigation Measure in the Mitigation, Monitoring and Reporting Plan (MMRP) is sufficient for the CEQA document to conclude that the City of San Jose would enforce the preparation and implementation of the plan.
	Construction Health and Safety Program: • Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);			

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	• Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920);			
	• Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522)			
	Operation Health and Safety Program: • Injury and Illness Prevention Program (8 Cal. Code Regs., §3203);			
	• Fire Prevention Plan (8 Cal. Code Regs., § 3221);			
	• Emergency Action Plan (8 Cal. Code Regs., § 3220);			
	• Personal Protective Equipment Program (8 Cal. Code Regs., §§3401-3411).			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.9.1.1: Hazards and Hazardous Materials Regulatory Framework pages 4.9-1 to 4.9-5 contains the level of discussion of relevant federal, state and local statutes and regulations. As identified in Section 3.2.1 Site Description page 3-1, the only relevant permits are the permits for the generators by the BAAD and the land use entitlements by the City of San Jose.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits,	Section 10.1: page 10-1.		For a SPPE, there is no need for the CEC to conduct a LORS analysis or to issue a

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	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.			License in lieu of all other state or local permits and therefore LORS Tables are not provided in this application.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 10.1: Agency Contacts page 10-1.		
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 1.3.1: page 1-4.		