

DOCKETED

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December 7, 2022

Curt Hilderbrand
Hydrostor, Inc.
400 Capitol Mall, Suite 3000
Sacramento, CA 95814-4497

**Re: CURE Data Requests Set 1 for Willow Rock Energy Storage
Center (21-AFC-02)**

Dear Mr. Hilderbrand:

California Unions for Reliable Energy ("CURE") submits this first set of data requests to Hydrostor, Inc. for the Willow Rock Energy Storage Center Project ("Project"), pursuant to Title 20, section 1716(b), of the California Code of Regulations. The requested information is necessary to: (1) more fully understand the Project; (2) assess whether the Project will be constructed and operated in compliance with all laws, ordinances, regulations, and standards; (3) assess whether the Project will result in significant environmental impacts; (4) assess whether the Project will be constructed and operated in a safe, efficient, and reliable manner; and (5) assess potential mitigation measures.

Pursuant to section 1716(f), written responses to these requests are due within 30 days. If you are unable to provide or object to providing the requested information by the due date, you must send a written notice of your objection(s) and/or inability to respond within 20 days.

Please contact us if you have any questions. Thank you for your cooperation with these requests.

Sincerely,



Richard M. Franco

Attachment
RMF:acp

5260-022acp

STATE OF CALIFORNIA

**State Energy Resources Conservation
and Development Commission**

In the Matter of:

**WILLOW ROCK ENERGY STORAGE
CENTER**

Docket No. 21-AFC-02

**CALIFORNIA UNIONS FOR RELIABLE ENERGY
DATA REQUESTS SET 1**

December 7, 2022

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Attorneys for California Unions for
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The following data requests are submitted by California Unions for Reliable Energy (“CURE”). Please provide your responses as soon as possible, but no later than December 30, 2022, to:

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Please identify the person who prepared your responses to each data request. If you have any questions concerning the meaning of any data requests, please let us know.

**WILLOW ROCK ENERGY STORAGE CENTER
CURE Data Requests Set 1 (Nos. 1-42)**

AIR QUALITY

BACKGROUND: AIR QUALITY DURING OPERATIONS

The Application for Certification (“AFC”) states that operation of the Project’s emergency diesel engines will result in emissions to the atmosphere of both criteria and toxic air pollutants. The AFC estimates that only one generator will operate at a time, but both generators are assumed to operate 200 hours per year. Appendix 5.1A, Table 1 (TN 240768-5) contains emissions calculations for criteria pollutants and greenhouse gases (“GHG”) from one diesel emergency generator during the operation phase of the Project. Footnotes (a) and (b) in Table 1 indicate that criteria pollutant emissions from the diesel emergency generator are based on equipment manufacturer specifications, but this information is not disclosed in the AFC.

DATA REQUESTS:

1. Please provide the CAT 2012 manufacturer specifications referenced in Footnote (a) and “emission data from manufacturer specifications (not-to-exceed)” referenced in Footnote (b) to Appendix 5.1A, Table 1.

PUBLIC HEALTH

BACKGROUND: VALLEY FEVER

The Project site is in an area that is highly endemic for Coccidioidomycosis, commonly known as Valley Fever. Coccidioidomycosis is an infectious disease caused by inhaling the spores of *Coccidioides* spp. When soil containing this fungus is disturbed by construction activities, the fungal spores become airborne, exposing construction workers and other nearby sensitive receptors. Over 3,000 cases and 30 deaths were recorded in Kern County last year, nearly triple the 2015 total. The AFC does not disclose and analyze the health risks from Valley Fever to construction workers and nearby sensitive receptors. Standard fugitive dust mitigation measures are not adequate to protect construction workers and nearby sensitive receptors from this risk.

DATA REQUESTS:

2. Please describe the methods that will be utilized to test the construction site to determine if spores of *Coccidioides* spp. are present and the timing for the test(s).
3. Please state whether a Valley Fever Mitigation Plan (“Plan”) will be prepared that includes measures to prevent Valley Fever outbreaks during Project construction and operation. If such a Plan has been prepared, please produce a copy of the Plan. If not yet prepared, please identify mitigation measures that may be included in the Plan, indicate when the Plan will be available, and include a copy in Docket 21-AFC-02 for this matter once available.

NOISE

BACKGROUND: SIGNIFICANCE CRITERIA

The California Environmental Quality Act (“CEQA”) Guidelines (Title 14, California Code of Regulations, Appendix G, Section XI) sets forth the significance criteria for a significant noise impact. AFC Section 5.7.3.1 at page 5.7-13 (TN 240751-13) states that the California Energy Commission (“CEC”) “staff has previously stated that an increase in background noise levels up to 5 dBA in a residential setting is insignificant; an increase of more than 10 dBA is generally considered significant; and an increase between 5 and 10 dBA may be either significant or insignificant, depending on the particular circumstances of the project. The CEC staff also has concluded that construction noise is typically insignificant if the construction activity is temporary, if noisy construction activities are limited to daytime hours, and if all feasible noise abatement measures are implemented for noise-producing equipment.” The AFC does not identify the source of these purported statements and conclusions by CEC staff.

DATA REQUESTS:

4. Please provide a copy of the document(s) where the CEC has provided the opinions regarding the significance of noise increases and construction noise, as described in AFC Section 5.7.3.1.

BACKGROUND: CONSTRUCTION NOISE

The Project’s construction noise impact evaluation was performed using CadnaA software. Section 5.7 of the AFC (TN 240751-13) states that the major noise sources modeled during construction were those “associated

with Project construction activities between months 15 and 18 when the most construction equipment will be operating at the same time and is estimated to have the highest noise impacts from the construction phase.” AFC Table 5.7-7 (TN 240751-13) discloses the construction noise source data and shows the construction noise source inputs as octave band levels. The CadnaA software allows the user to input source parameters as sound power or sound pressure levels, number of minutes/usage rate, or a daily schedule. The output of the CadnaA software can show various metrics, such as an hourly Leq or a daily Ldn. AFC Table 5.7-8 (TN 240751-13) shows the modeled noise from construction of the project, which are also shown as noise contours in AFC Figure 5.7-3 (TN 240751-13). However, the AFC failed to disclose all of the input parameters for the construction noise calculations that are critical to understanding the outputs of the CadnaA software. For hourly Leq calculations, the number of minutes the source will be in use during the hour is essential for the calculation; for Ldn calculations, the number of hours the source will be in use during the daytime (7AM to 10 PM) and nighttime (10 PM to 7 AM) is essential to know.

DATA REQUESTS:

5. Please state whether the input data in AFC Table 5.7-7 is shown as sound power or sound pressure levels. If sound pressure levels, please provide the reference distances.
6. Please provide a copy of the CadnaA model files used for the construction noise calculations.
7. Please clarify what metric is being shown for the modeled results in Table 5.7-8 and contours in Figure 5.7-3, e.g., hourly Leq or daily Ldn.

BACKGROUND: OPERATIONAL NOISE

The evaluation in the AFC of operational noise for all major noise sources assumes a normal fully operational scenario, but the operational noise methodology did not consider shutdown, start-up, or emergency operations, and all noise sources were assumed to be point sources. AFC Table 5.7-10 (TN 240751-13) shows the operations noise source inputs as octave band levels. As noted above, the CadnaA software allows the user to input source parameters. The output of this software can show various metrics, such as an hourly Leq or a daily Ldn. AFC Section 5.7.3.3.3 (TN 240751-13) includes a discussion of tonal noise sources. Tonal noise sources are typically evaluated on a narrow band or 1/3-octave band basis. AFC Table 5.7-11 (TN 240751-13) shows the modeled noise from Project operations, and these are also shown as noise contours in AFC Figure 5.7-4 (TN 240751-13).

However, the AFC fails to disclose all of the input parameters for the operational noise calculations that are critical to understanding the outputs of the CadnaA software.

DATA REQUESTS:

8. Please state whether the data in Table 5.7-10 is shown as sound power or sound pressure levels. If sound pressure levels, please provide the reference distances.
9. Please clarify what metric is being shown for the modeled results in Table 5.7-11, Table 5.7-12, and Figure 5.7-4, e.g., hourly Leq or daily Ldn.
10. Please provide an explanation of Footnote (a) in Table 5.7-11.
11. Please provide 1/3-octave band data for operational noise sources listed in Table 5.7-10 that could have a tonal component or provide a discussion of the frequency range and the typical magnitude of these tonal effects.

BIOLOGICAL RESOURCES

BACKGROUND: CONSTRUCTION IMPACTS ON WILDLIFE

The AFC at pages 5.2-30 through 5.2-31 (TN 242791) examines four ways in which construction activities could *temporarily* impact special-status wildlife species but concludes that “[t]he implementation of avoidance and minimization measures and agency approved mitigation practices will assist in preventing *permanent* direct adverse impacts to special-status wildlife species.” The AFC, however, omits an analysis of the *permanent* impacts to wildlife during construction activities to support the conclusion that such impacts may be prevented. Habitat loss, fragmentation, and degradation are examples of permanent impacts during construction activities to special-status wildlife species that may be significant. However, the AFC does not analyze these permanent impacts.

DATA REQUESTS:

12. Please provide the analysis of the permanent direct adverse impacts to special-status wildlife species from the Project’s construction activities.

13. Please describe the “agency approved mitigation practices” that would be implemented to reduce the Project’s significant permanent direct impacts to special-status wildlife species during construction activities.

BACKGROUND: NOISE IMPACTS ON WILDLIFE

The AFC at page 5.2-33 (TN 242791) describes the impacts to sensitive and special-status wildlife species due to noise generated by operation of the Project as follows:

“Only a nominal amount of habitat outside of the GESC site will experience noise levels within in [sic] the 60 A-weighted-decibel (dBA) equivalent sound level (Leq) contour. The wildlife species observed in the GESC Project vicinity occur in areas that has been impacted by agriculture, agricultural machinery, traffic, and overhead power lines in sparsely developed parcels in Willow Springs. As such, they are expected to adapt to the new noise levels that are less than the typical noise effect threshold of 60 dBA Leq hourly.”

However, as discussed in the AFC at page 5.7-1 (TN 240751-13), the “A-weighted” sound level (noted in units of dBA) corresponds to sound frequencies sensitive to the human ear whereas many wildlife species hear at lower or higher frequencies than humans. Furthermore, compared to humans, a particular animal species may be more (or less) sensitive to noise at a given frequency level within the A scale. Terrestrial wildlife responses begin at noise levels of approximately 40 dB. Therefore, weighting systems and noise effect thresholds developed for humans are not appropriate for wildlife species that have substantially different audiograms.

Additionally, noise affects wildlife in numerous ways. Although some species have demonstrated the ability to adapt to some noise effects, these same species may be incapable of adapting to other noise effects. For example, certain bird species adapted to communicating in noisy environments by adjusting their song frequency levels, but these same species may not be able to adapt to mitigate noise that interferes with the ability to hear predators. Consequently, even species that appear to habituate to anthropogenic sources of noise are susceptible to adverse impacts.

The effects of noise on wildlife depend on the nature of the noise stimulus. Chronic noise mainly interferes with an animal’s ability to detect important sounds, whereas impulsive noise (a short, unpredictable noise event such as a blast) is often perceived as a threat. Whereas Leq hourly

data may be the appropriate metric for estimating chronic noise levels associated with the Project, Lmax data are needed to assess impacts caused by impulsive noise.

DATA REQUESTS:

14. Please provide unweighted Lmax and Leq data for the equipment listed in AFC Tables 5.7-7 and 5.7-10.
15. Please provide figures that depict unweighted Lmax and Leq noise contours associated with the Project's construction noise and the Project's operational noise.
16. Please explain the basis for the "threshold of 60 dBA Leq hourly" and why this threshold was used to analyze impacts to wildlife.

BACKGROUND: NIGHT LIGHTING

Operation of the Project will require onsite lighting for safety and security as well as approach lighting for the substation, control equipment enclosures, and operator interface locations. According to the AFC at page 5.13-16 (TN 240751-19), "[l]ight level will comply with recommendations of the Illuminating Engineering Society (IES), as well as CEC and local jurisdictions ordinances or codes, to ensure lighting is no brighter than necessary." The AFC at page 5.2-32 (TN 242791) concludes that "[b]ased on GESC's equipment and the limited application of outdoor lighting and best practices, noise, and light impacts from GESC's operations will likely have a less than significant impact on special-status wildlife." The AFC does not provide sufficient information to support this conclusion.

DATA REQUESTS:

17. Please specify the light level recommendations of the Illuminating Engineering Society referenced in the AFC at page 5.13-16 (TN 240751-19).
18. Please provide the Project's lighting plan.

BACKGROUND: GENERATOR TIE-LINE

Activities related to the construction of the preferred route or alternative routes of the Project's generator tie-line ("gen tie-line") will require site preparation, including clearing and grubbing, and installation of associated access roads, if needed. The AFC at page 5.2-26 (TN 242791)

states that “construction of the gen-tie line will occur in areas mixed between previously developed/disturbed and undeveloped areas however will follow already existing overhead powerlines.” AFC Figure 5.2-6 (TN 242791) provides a map of proposed new and existing access routes to the Southern California Edison (“SCE”) Whirlwind Substation. AFC Table 8b (TN 242791) quantifies the construction impacts from new access roads along new access routes to the Whirlwind Substation. Table 8b suggests that no new access roads would be constructed along existing access routes to the Whirlwind Substation. However, it is likely that new gen-tie access roads would need to be constructed along segments with existing transmission lines. Horizontal separation is required between transmission lines such that a new access road parallel to the existing road(s) is typically needed when a new transmission line is installed. Additional information about the Project’s construction of new access roads and other ground disturbing activities along the preferred and alternative gen-tie routes is necessary to assess the Project’s potentially significant impacts on sensitive biological resources.

DATA REQUESTS:

19. Please describe the gen-tie construction activities that would require clearing and grubbing.
20. Please state whether clearing and grubbing would be required for maintenance of the gen-tie line.
21. Please state the location and dimensions for the new access roads that may be required for the Project’s gen-tie line.
22. Please explain whether new access road(s) would be constructed along the “existing access route” segments identified in AFC Figure 5.2-6 (TN 242791).
23. Please explain whether new access road(s) would be constructed along Alternate Route 2A or 2B to the future Los Angeles County Department of Water and Power (“LADWP”) Substation.
24. Please explain how the values in AFC Tables 8a, 8b, 9a, and 9b (TN 242791) were calculated, including any assumptions that were built into those calculations.

BACKGROUND: AVIAN COLLISIONS AND ELECTROCUTIONS

The Project includes the installation of a new 230-kV transmission line, as well as an optical ground wire and single mode fiber optic cable to

provide two separately routed telecommunications paths. The AFC does not disclose the location for the optical ground wire and fiber optic cable in relation to the power lines. The location for this wire and cable is important because the ground (or shield) wire or fiber optic cable can be very hazardous to birds if it is strung above the power lines.

The AFC at page 5.2-23 (TN 242791) also states that “[t]he 230-kV transmission line is inherently raptor safe against electrocution and collisions and would parallel existing aboveground electrical infrastructure.” The AFC, however, fails to provide evidence to support the assertion that the 230-kV transmission lines do not pose a collision risk.

The AFC continues at page 5.2-33 (TN 242791) to explain that “[b]ird collisions with electric conducting wires occur when birds are unable to see the lines, especially during fog or rain events. Factors that affect the risk of collision include weather conditions, behavior of the species of bird, and design and location of the line.” The AFC omits any site-specific analysis of these factors and merely assumes that installing the transmission lines parallel to existing aboveground electrical infrastructure minimizes the collision risk. This assumption is contingent on several variables, including the spatial arrangement of the Project’s transmission lines in relation to the existing lines. Moreover, although the AFC states that the Project’s transmission lines would be installed along routes with existing powerlines, Google Earth imagery does not display existing powerlines along certain route segments.

DATA REQUESTS:

25. Please disclose the location(s) of the optical ground wire and fiber optic cable in relation to the Project’s power lines.
26. Please provide a map that identifies the transmission line route segments with existing aboveground powerlines for both the preferred route to the Whirlwind Substation and the alternative routes to the future LADWP substation.
27. Please describe the spatial arrangement of the Project’s transmission lines in relation to existing powerlines. This description should include both the horizontal and vertical spacing.
28. Please discuss how the Project’s gen-tie line components would adhere to the Avian Power Line Interaction Committee (“APLIC”) practices for avian protection from power lines.

BACKGROUND: CUMULATIVE IMPACTS

There are past, present, and reasonably foreseeable future projects within the vicinity of the Project site that may result in significant cumulative impacts on biological resources. The AFC's Biological Technical Report at page 50 (TN 242779) states that "[c]umulative impacts of this Project must be weighed with pending projects in the Project vicinity; these may include solar developments, wind farms, residential, roadways, and infrastructure, among others." However, none of these cumulative projects were disclosed or analyzed in the AFC. According to the AFC Biological Technical Report at page 7 (TN 242779), the Applicant's biologists reviewed biological resource reports prepared for other projects in the Project vicinity, "including the Big Beau Solar Project, Kern County, California, Biological Technical Report (ICF 2019) and the Biological Resources Technical Report, AVEP Solar Project (Western EcoSystems Technology 2020)." Some of these projects have components that overlap with the right of way ("ROW") for the Project's gen-tie line. For example, gen-tie Route F would bisect the solar field for the Rabbitbrush Solar Project, while gen-tie Route 2A would cross the collection line route for the Chaparral Solar Project (collectively referred to as the "AVEP Solar Project").

Additionally, this Project site is located entirely within the Willow Springs Specific Plan area of Kern County, California. Implementation of the Willow Springs Specific Plan was determined to result in unavoidable, significant impacts to the Mojave spineflower, which is identified in the AFC (TN 242779, Attachment D) as present in the Project Survey Area. The Project's cumulative impacts on this species as well as other biological resources requires an adequate analysis of the cumulative impacts from past, present, and reasonably foreseeable future projects within the vicinity of the Project site, as well as mitigation measures to address any significant cumulative impacts on biological resources.

DATA REQUESTS:

29. Please provide a list of past, present, and reasonably foreseeable future projects within the Project vicinity for the Project's cumulative impacts analysis on biological resources. If none are identified, please explain why not.

30. Please list the biological resource reports for projects in the Project vicinity that the Applicant's biologists reviewed if not already identified on page 7 of the Biological Technical Report (TN 242779).

31. Please explain how the information and data in the biological resource reports for projects in the Project vicinity identified on page 7 of the Biological Technical Report (TN 242779) and any other reports reviewed by the Applicant's biologists informed the Applicant's field survey efforts.

BACKGROUND: AMERICAN BADGER

The American badger is a California Species of Special Concern. The AFC at page 5.2-24 (TN 242791) assumed absence of the American badger and did not analyze the Project's impacts on the species. However, in response to DR40 (TN 245698), the Applicant stated that "[b]ased on signs observed, presence of the [American badger] is assumed. As such, pre-construction surveys will be conducted. Pre-construction survey methods and buffers for [American badger] will be in consultation with the CEC and CDFW." Additional information is needed regarding the pre-construction surveys proposed for this species. For example, because the American badger has a relatively large home range and may dig a new den each night, a pre-construction survey that is conducted several days (or weeks) prior to Project ground disturbance activities would not provide adequate data on the presence (or absence) of dens when ground disturbance occurs.

DATA REQUESTS:

32. Please state when the pre-construction surveys for the American badger will be conducted in relation to initiation of the Project's ground-disturbance activities.
33. Please describe the mitigation measures that may be implemented to mitigate the Project's impacts on habitat for the American badger.
34. Please state whether the Applicant will implement the 50-foot (occupied dens) and 250-foot (natal dens) buffer distances recommended in the California Department of Fish and Wildlife's ("CDFW") comment letter at page 19 (TN 245782).

BACKGROUND: DESERT TORTOISE

Three Class 5 burrows suitable for juvenile desert tortoises were detected by the Applicant's biologists within the Survey Area. The AFC's Biological Technical Report at page 38 (TN 242779) states that "[w]hile three suitable burrows were found within the Survey Area in suitable habitat, the lack of tortoise sign indicated burrow usage by wildlife other than tortoises." Moreover, the Applicant's Response to DR30 (TN 245698) states that "[n]o

tortoise sign was present in the vicinity of these burrows. Additionally, spider webbing was present at one of the burrow entrances indicating that burrow was not occupied at the time of the surveys, and no juvenile or adult desert tortoises were observed during either the focused surveys or other surveys completed for the Project.”

DATA REQUESTS:

- 35. Please explain the basis for determining that the burrows were being used by wildlife other than desert tortoises.
- 36. Please identify the other wildlife species that may have been using the burrows within the Survey Area.
- 37. Please provide the date(s) at which time the Class 5 burrows were detected.

BACKGROUND: GOLDEN EAGLE

The AFC at page 5.2-21 (TN 242791) states that no nesting habitat for golden eagles occurs within the Project Survey Area, but that “[p]otentially suitable nesting habitat occurs east of and outside of the survey area.” The AFC provides no additional details pertaining to the potential nesting habitat, which is required in order to evaluate the need for: (a) surveys to identify nesting pairs of eagles that might be disturbed by Project activities, and (b) mitigation measures to minimize Project impacts to golden eagle nesting territories. For example, if potential nesting habitat is present within one mile of the Project site, surveys may be required to ensure compliance with the U.S. Fish and Wildlife Service’s (“USFWS”) guidance stipulating a one-mile no-disturbance buffer surrounding golden eagle nesting sites in California.

DATA REQUESTS:

- 38. Please describe the potential nesting habitat for golden eagles that occurs east of the Survey Area and state the distance of this potential nesting habitat from the Project site.

BACKGROUND: PERIMETER FENCE

The AFC at page 1-6 (TN 240751-2) states that the Project would contain “[s]ecure perimeter chain link fencing with four site access points, a main entrance gate on Sweetser Road, two secondary access gates on Sweetser Road, and a secondary access gate on Tehachapi Willow Springs

Road.” The Applicant’s response to DR19 regarding the stormwater ponds (TN 246210) states that “[t]he Site will be enclosed with a fence to prevent wildlife from entering the Project.” It is unclear whether the “Site” referenced in the response to DR19 refers to the stormwater ponds or the entire Project site. Furthermore, although the fence may prevent wildlife from entering the Project site, it also may trap animals within the site where they would be subject to various types of direct and indirect mortality unless clearance surveys are conducted immediately before and after fence installation. The AFC does not identify the timing of fence installation in relation to Project activities that may cause mortality of wildlife (e.g., due to collisions with vehicles) and does not include clearance surveys as a mitigation measure.

DATA REQUESTS:

- 39. Please explain when perimeter fence installation will occur in relation to other Project construction activities.
- 40. If the perimeter fence will be installed before completion of all other construction activities, please discuss the mitigation measures that would be implemented to prevent entrapment of wildlife within the perimeter of the fence.
- 41. Please state whether the stormwater ponds would be fenced in addition to the perimeter fence.
- 42. Please state whether the perimeter fence would have barbed wire.

Dated: December 7, 2022

Respectfully submitted,

Original Signed by:

/s/ Richard M. Franco

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