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**CALIFORNIA
ENERGY COMMISSION**



**CALIFORNIA
NATURAL
RESOURCES
AGENCY**

March 28, 2024

IP Perkins, LLC
c/o Intersect Power, LLC
Attn: Camille Wasinger
9450 SW Gemini Drive PMB #68743
Beaverton, OR 97008

Determination of Incomplete Application and Request for Information for the Perkins Renewable Energy Project (24-OPT-01)

Dear Camille Wasinger,

On February 27, 2024, California Energy Commission (CEC) staff confirmed receipt of an Opt-in Application for the Perkins Renewable Energy Project (project) (24-OPT-01) by IP Perkins, LLC, IP Perkins BAAH, LLC, and related affiliates (collectively, "Applicant"), subsidiaries of Intersect Power, LLC. The applicant proposes to construct, operate, maintain, and decommission an approximately 1,150-megawatt (MW) solar photovoltaic (PV) and battery energy storage system (BESS) on United States Bureau of Land Management and Bureau of Reclamation administered public lands (approximately 5,611 acres), and private lands (approximately 515 acres) in Imperial County east of El Centro, California.

The project would generate and store renewable electricity via arrays of solar PV panels, a BESS, and appurtenant facilities. The final project capacity would be based on optimization of buildable acreage and solar PV technology at the time of procurement. The project would construct a new generation interconnection line (gen-tie) that would connect the project substation to a new high-voltage breaker and a half switchyard. The gen-tie would be approximately 200 feet or 1.3 miles in length depending on the two optional locations of the substation. From the switchyard, two new 500 kilovolt (kV) loop-in transmission lines would be constructed to interconnect to the existing San Diego Gas & Electric Company (SDG&E) 500 kV Southwest Power Link Transmission Line that travels east-west just south of the project site.

The CEC staff has finished its initial review of the project application pursuant to California Code of Regulations, title 20, section 1877, which specifies the required contents of an application and Public Resources Code, section 25545.4(a), which states, "within 30 days of the submission of the application, the commission shall review the application and make a determination of completeness." Based on this review, staff has determined the submitted application is incomplete.

Review of the application identified data deficiencies in a total of 16 environmental and engineering topic areas and several Mandatory Opt-in Requirements. Under Public Resources Code, section 25545.4(b), the CEC staff requests the information described in the attachments to this memorandum. The attachments consist of: 1) data completeness worksheets listing the requirements specified in statute and regulations, and 2) requests for additional information needed for staff to complete its environmental analysis of the proposed project, which includes input from partner agencies who have a memorandum of understanding with the CEC to perform a related review for opt-in applications.

All requested information is reasonably necessary to prepare an Environmental Impact Report as part of a CEC Staff Assessment and to support a decision on the application, including all the findings required in Chapter 6.2 of Division 15 of the Public Resources Code.

Staff asks the applicant to file the requested data in as few submittals as possible and provide an estimate of when the remaining data can be submitted. Since the data requested may take some time to fully assemble, staff would prefer responses to be held until a complete response to each data request can be submitted. In other words, please do not submit partial responses to any data request (e.g., DR AQ-1 part 1).

Consistent with Public Resources Code, section 25545.4(c)(2) and California Code of Regulations, title 20, section 1878, upon receipt of all information responsive to this request, *accompanied by a statement from the Applicant that its response to this request for information is now complete and addresses all identified deficiencies*, CEC staff will finalize review of the information provided and document its determination regarding application completeness in a subsequent letter.

If you have any questions about the information identified as necessary to complete the application, please email Lisa Worrall, project manager, at lisa.worrall@energy.ca.gov, or Ann Crisp, co-project manager at ann.crisp@energy.ca.gov.

Sincerely,



Drew Bohan
Executive Director

Attachments

Attachment A: Data Completeness Worksheets for Title 20, section 1877

Attachment B: Data Requests

Attachment A

Data Completeness Worksheets
for Title 20, section 1877

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x**

Revision No. 0 Date: March 28, 2024

Technical Area: **Mandatory Opt-In Requirements** Project: Perkins Renewable Energy Project Technical Staff: Various

Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Eric Knight

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
AUTHORITY AND VERIFICATION				
Cal. Code Regs., tit. 20 § 1707	Every notice and application shall be dated and signed by the applicant attesting under penalty of perjury to its truth and accuracy.	Cover letter	No	See DR MAND-1
"FACILITY" OR "DISCRETIONARY PROJECT" DEFINITION MET				
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)	Explanation of how the facility meets one or more of the definitions of "facility":	Subsection 2.1.1, p. 2.1-1 Subsection 2.3.2, pp. 2.3-9 to 2.3-15	Yes	
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)(4);	If the opt-in application is seeking certification for a discretionary project pursuant to Public Resources Code section 25545(b)(4), the application shall contain a detailed description of how the facility meets the criteria specified in section 25545(b)(4) including, as applicable, what the facility would manufacture, produce, or assemble, and how the facility's products or services would be used in the manufacture, production, or assembly of (1) energy storage systems or component manufacturing, (2) wind systems or component manufacturing, (3) solar photovoltaic energy systems or component manufacturing, or (4) specialized products, components, or systems that are integral to renewable energy or energy storage technologies.	N/A	N/A	N/A

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Project: Perkins Renewable Energy Project

Technical Staff: Various

Project Manager: Lisa Worrall/Ann Crisp

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
REQUIREMENTS FOR COVERED PROJECT UNDER THE LABOR CODE				
Cal. Code Regs., tit. 20, § 1877(c)	Certifications required by Public Resources Code sections 25545.3.3 and 25545.3.5.	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.3	Certification that the applicant will meet the requirements of a covered project and the commission shall make the requirements a condition of certification. Include the applicant's certification that either of the following is true:	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.3(a)	The entirety of the construction of the covered project is a public work.	N/A	N/A	N/A
Pub. Resources Code, § 25545.3.3(b)	The construction of the covered project is not in its entirety a public work for which prevailing wages must be paid, but all construction workers employed on the project will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, pursuant the Labor Code sections 1773 and 1773.9, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. For portions of the project that are not a public work, all of the following apply:	Appendix E.4	Yes	

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Project: Perkins Renewable Energy Project

Technical Staff: Various

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

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

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(5)	Except as provided in (b)(6), the pay prevailing wage provisions listed within this section may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to the Labor Code sections 1741, 1742, 1771.2, and 1742.1.	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)	Paragraphs (b)(4) and (b)(5) do not apply if all contractors and subcontractors performing construction work on the project are subject to a project labor agreement. The project labor agreement shall include, but not be limited to, the following:	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(A)	Provisions requiring payment of prevailing wages to all construction workers employed in the construction of the project and for enforcement of that obligation through an arbitration procedure.	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(B)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a relevant local agency.	Appendix E.4	Yes	

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Pub. Resources Code, § 25545.3.3(b)(6)(C)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(D)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.5	Certify that a skilled and trained workforce will be used to perform all construction work on the project and all of the following apply:	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.5(a)	Require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a skilled and trained workforce to construct the project.	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.5(b)	Every contractor and subcontractor must use a skilled and trained workforce to construct the project.	Appendix E.4	Yes	

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Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Eric Knight

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5(c)	Except as provided in (e), contractors and subcontractors that fail to use a skilled and trained workforce shall be subject to the penalties provided in the Public Contract Code section 2603.	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.5(d)	Except as provided in (e), the applicant must retain records, including copies of monthly reports, that demonstrate compliance with the Public Contract Code section 2600 while the project or contract is being performed and for three years after completion of the project or contract. The applicant must submit these records immediately upon request of the commission. When submitted to the commission, these records shall be a public record under the California Public Records Act and shall be open to public inspection.	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.5(e)	(c) and (d) do not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement. The project labor agreement shall also include, but not be limited to, all of the following:	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.5(e)(1)	Provisions requiring compliance with the skilled and trained workforce requirement and for enforcement of that obligation through an arbitration procedure.	Appendix E.4	Yes	

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Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Eric Knight

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Pub. Resources Code, § 25545.3.5(e)(2)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a local agency.	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.5(e)(3)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix E.4	Yes	
Pub. Resources Code, § 25545.3.5(e)(4)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix E.4	Yes	

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Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
PERMIT APPLICATIONS SUBMITTED (LOCAL, STATE, AND FEDERAL)				
Cal. Code Regs., tit. 20, § 1877(d)	A discussion of whether the applicant has submitted any local, state, or federal permit applications. For any required permit that has not yet been submitted to the relevant state agency, include a plan for submitting the application and any discussions that have occurred with the state agency with authority over the project.	Section 4.1.6, p. 4.1-32; Section 4.2, p. 4.2-35, pp. 4.2-46 to 4.2-47; Section 4.3.7, p. 4.3-45; Section 4.4.6, p. 4.4-29; Section 4.5.6, p. 4.5-19; Section 4.6.5, p. 4.6-24; Section 4.7.8, p. 4.7-14; Section 4.8.6, p. 4.8-12; Section 4.9.6, p. 4.9-9; Section 4.10.6, p. 4.10-77; Section 4.11.6, p. 4.11-19; Section 4.12.6, p. 4.12-27; Section 4.13.6, p. 4.13-27; Section 4.14.5, p. 4.14-19; Section 4.15.6, p. 4.15-34; Section 4.16.6, p. 4.16-19; Section 4.17.6, p. 4.17-25; Appendix E.2	No	See DR AQ-11, DR BIO-32, DR LAND-6, DR TRANS-1

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
IDENTIFICATION OF WHETHER SITE IS LOCATED AT A PROHIBITED AREA				
Cal. Code Regs., tit. 20, § 1877(e)	Identify whether the project is, on a prohibited site as identified in Public Resources Code section 25527 or on a site designated by the California Coastal Commission under Public Resources Code section 30413(b) or on a site designated by the San Francisco Bay Conservation and Development Commission under Government Code section 66645(b). Include documentation of the approval of the public agency having ownership or control of the land.	Subsection 4.6.1, pp. 4.6.1-3 to 4.6.1-13	Yes	
Pub. Resources Code, § 25527	The following areas of the state shall not be approved as a site for a facility, unless the commission finds that such use is not inconsistent with the primary uses of such lands and that there will be no substantial adverse environmental effects and the approval of any public agency having ownership or control of such lands is obtained: 1. State, regional, county and city parks; wilderness, scenic or natural reserves; areas for wildlife protection, recreation, historic preservation; or natural preservation areas in existence on the effective date of this division.	Subsection 4.6.1, pp. 4.6-10 to 4.6-13	Yes	

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Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Eric Knight

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	<p>2. Estuaries in an essentially natural and undeveloped state.</p> <p>In considering applications for certification, the commission shall give the greatest consideration to the need for protecting areas of critical environmental concern, including, but not limited to, unique and irreplaceable scientific, scenic, and educational wildlife habitats; unique historical, archaeological, and cultural sites; lands of hazardous concern; and areas under consideration by the state or the United States for wilderness, or wildlife and game reserves.</p>			
NET POSITIVE ECONOMIC BENEFIT TO THE LOCAL GOVERNMENT				
<p>Cal. Code Regs., tit. 20, § 1877(f)</p>	<p>Identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code section 25545.9. Staff must provide the submitted information to the local government for review and comment.</p>	<p>Appendix E.3, pp. 10 to 11; Appendix R</p>	<p>No</p>	<p>See DR MAND-2</p>

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Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Eric Knight

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20 § 1879(a)(7); Pub. Resources Code § 25545.9	... economic benefits may include, but are not limited to the following: (a) Employment growth. (b) Housing development. (c) Infrastructure and environmental improvements. (d) Assistance to public schools and education. (e) Assistance to public safety agencies and departments. (f) Property taxes and sales and use tax revenues.			
LEGALLY BINDING ENFORCEABLE AGREEMENT(S) FOR COMMUNITY BENEFITS OF THE PROJECT				
Cal. Code Regs., tit. 2, § 1877(g)	Discussion of applicant's plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreement(s) with, or that benefit, a coalition of one or more community-based organizations prior to project certification, consistent with Public Resources Code section 25545.10.	Subsection 4.10.2, p. 4.10-65; Appendix S	No	See DR MAND-3
ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT REQUIREMENTS				
Cal. Code Regs., tit. 20, § 1877(h)	A discussion of whether the project meets the requirements of Public Resources Code sections 21183 and 21183.6.	Appendix E.3	Yes	
Pub. Resources Code § 21183(a)	The project will result in a minimum investment of \$100,000,000 in California upon completion.	Appendix E.3, p.5	Yes	

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(b)	The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, provides construction jobs and permanent jobs for Californians, helps reduce unemployment, and promotes apprenticeship training.	Appendix E.3 p. 6; Appendix E.4	Yes	
Pub. Resources Code § 21183(c)	For a project described in Public Resources Code Section 21180(b)(1), (2), and (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles, the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation. A project is deemed to meet the requirements of this paragraph if the applicant demonstrates compliance with Public Resources Code section 21183.6.	Appendix E.3, p. 7	No	See DR GHG-1 to GHG-3
Pub. Resources Code § 21183(d)	Demonstrates compliance with the requirements of recycling commercial solid waste and organic solid waste as required under Public Resources Code sections 42649 and 42649.8.	Appendix E.3, p. 7	Yes	

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(e)	Applicant entered into a binding and enforceable agreement that all mitigation measures required to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, that those measures will be monitored and enforced by the lead agency for the life of the obligation.	Appendix E.3, p. 7	No	See DR MAND-4
Pub. Resources Code § 21183(f)	Applicant agrees to pay the costs of the trial court and the court of appeal in hearing and deciding any case challenging a lead agency's action on a certified project under this division...	Appendix E.3, p. 8	Yes	
Pub. Resources Code § 21183(g)	Applicant agrees to pay the costs of preparing the record of proceedings for the project concurrent with review and consideration of the project under this division...	Appendix E.3, p. 8	Yes	
Pub. Resources Code § 21183(h)	For a project for which environmental review has commenced, the applicant demonstrates that the record of proceedings is being prepared in accordance with Public Resources section 21186.	Appendix E.3, p. 8	Yes	

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Pub. Resources Code § 21183.6(a)	The quantification and mitigation of the greenhouse gas emission impacts of a project described in 21180(b)(1), (2), or (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles must be as follows:	--	--	--
Pub. Resources Code § 21183.6(a)(1)	The environmental baseline for greenhouse gas emissions must be established based upon the physical environmental conditions in the vicinity of the project site at the time the application is submitted.	Appendix E.3, p. 8; Subsection 4.1.1; Appendix H	Yes	
Pub. Resources Code § 21183.6(a)(2)	Demonstrate that the mitigation of the impacts resulting from the emissions of greenhouse gases are achieved in the following priority: 1. Direct emissions reductions from the project that also reduce emissions of criteria air pollutants or toxic air contaminants through implementation of project features, project design, or other measures, including, but not limited to, energy efficiency, installation of renewable energy electricity generation, and reductions in vehicle miles traveled.	Appendix E.3, p. 9; Appendix H	Yes	

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

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 Technical Area: **Mandatory Opt-In Requirements** Project: Perkins Renewable Energy Project Technical Staff: Various
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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	benefit to the region in which the project is located.			

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Completeness: Complete Incomplete **x** Revision No. 0 Date: March 28, 2024
 Technical Area: **Air Quality** Project: Perkins Renewable Energy Project Technical Staff: Wenjun Qian/Yifan Ding
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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.	Section 4.1, Subsection 4.1.2, pp. 4.1-10 to 4.1-12; Appendix H.5, pp. 28 to 29	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.1, Subsection 4.1.1, pp. 4.1-3 to 4.1-10	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 4.1, Subsection 4.1.7, pp. 4.1-32 to 4.1-33; Appendix H.7, pp. 36 to 39	Yes	
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 4.1, Subsection 4.1.3, pp. 4.1-26 to 4.1-27	No	See DR AQ-7 to DR AQ-10, DR GHG-1 to DR GHG-5

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 Technical Area: **Air Quality** Project: Perkins Renewable Energy Project Technical Staff: Wenjun Qian/Yifan Ding
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Joseph Hughes

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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.	Section 4.1, Subsection 4.1.5, Table 4.1-13	No	See DR AQ-1 and DR AQ-2
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.	Section 4.1, Subsection 4.1.2, pp. 4.1-10 to 4.1-12	No	See DR AQ-3
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Appendix I.1	No	See DR PD-2
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	N/A	N/A
Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO ₂ , CH ₄ , N ₂ O, and SF ₆) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.	Section 4.1, Subsection 4.1.2, Table 4.1-9, Table 4.1-10	No	See DR AQ-3, DR PD-2
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.	Section 4.1, Subsection 4.1.2, pp. 4.1-11 to 4.1-12	No	See DR GHG-6, DR GHG-7

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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	N/A	N/A
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 4.1, Subsection 4.1.1, Table 4.1-2, Table 4.1-3	No	See DR AQ-4, DR AQ-5
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.	Appendix H.2, p.8	No	See DR AQ-6

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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.	Appendix H.2, p.8	No	See DR AQ-6
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.	Appendix H.2, p.8	No	See DR AQ-6
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of:	--	--	--
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	Appendix H.6, pp. 30 to 32, Table 12	No	See DR AQ-7, DR AQ-8

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	diameter (PM2.5) from construction-related equipment;			
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;	Appendix H.6, pp. 32 to 33, Table 13	No	See DR AQ-7 to DR AQ-9
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 4.1, Subsection 4.1.3, pp. 4.1-26 to 4.1-27	No	See DR AQ-10
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} .	Appendix H.6	No	See DR AQ-8, DR AQ-9

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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:	--	--	--
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	Appendix H.6, pp. 34 to 35	Yes	
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	Appendix H.6, pp. 34 to 35	Yes	
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.	Appendix H.3, pp. 23 to 27	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 4.1, Subsection 4.1.5, Table 4.1-11, Table 4.1-12, Table 4.1-13	Yes	

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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.	Appendix E.2, Table 2, Table 3	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1, Table 1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix E.2	No	See DR AQ-11

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 Technical Area: **Alternatives** Project:
 Project Manager: Lisa Worrall/Ann Crisp Docket:

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 Technical Staff: Paul Miller
 Technical Senior: Steven Kerr

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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 5, pp. 5-1 to 5-15	Yes	
Appendix B (f) (2)	An evaluation of the comparative engineering, economic, and environmental merits of the alternatives discussed in (f)(1).	Section 5, pp. 5-3 to 5-15	Yes	

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Technical Area: Biological Resources

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Technical Staff: A. Rosales, E. Weiss

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Eric Knight

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Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Section 4.2; Appendix J.1; Appendix M.6	No	See DR BIO-1, DR BIO-14, DR BIO-19, DR BIO-20
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 4.2 (pp. 4.2-1 to 4.2-6); Appendix J.1 (pp. 7 to 10); Appendix M	No	See DR BIO-1, DR BIO-14, DR BIO-19, DR BIO-20
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 4.2 (pp 4.2-1, 4.2-3, 4.2-47), Appendix J.1 (pp 6, 24-27), Appendix J2 (pp 9, 18-19), Appendix M	No	See DR BIO-2, DR BIO-32
[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).	Appendix K	No	See DR BIO-3, DR BIO-11, DR BIO-27, DR BIO-28, DR BIO-29

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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 4.2 (pp. 4.2-6 to 4.2-41), Subsection 4.2.4, Appendix J.1, Section 1.3, Section 2, Section 4, Subsection 4.2.7, Appendix D.1, Appendix D.2, Appendix K, Appendix L., Appendix M.1, Appendix M.2., Appendix M.3., Appendix M.4, Appendix M.5, Appendix M.6	No	See DR BIO-3, DR BIO-6, DR BIO-9, DR BIO-14 to DR BIO-16, DR BIO-19, DR BIO-20, DR BIO-23 to DR BIO-25, DR BIO-27, DR BIO-28
Appendix B (g) (13) (A)	A regional overview and discussion of terrestrial and aquatic biological resources, with particular attention to sensitive biological resources within 10 miles of the project. In the discussion include a list of the USGS topographic quadrangle(s) utilized to search records from the California Natural Diversity Database (CNDDDB), and a citation which includes the date the CNDDDB was accessed. Include a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) showing sensitive biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan	Section 4.2, Figure 4.2-2, Appendix J.3., J.4	No	See DR BIO-6, DR BIO-13

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	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;	Section 4.2, Subsection 4.2.1, Table 4.2-3, Table 4.2-4, Appendix J.1, Section 3.1 to 3.4, Section 4.1 to 4.2, Appendix A	No	See DR BIO-6, DR BIO-17
Appendix B (g) (13) (A) (ii)	species receiving consideration during environmental review under CEQA Guidelines 14 CCR Section 15380;	Section 4.2 (pp. 4.2-22 to 4.2-33), Table 4.2-4, Appendix J.1., Section 4.1, Appendix A, Appendix J.5	No	See DR BIO-1
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;	Section 4.2.2. (pp. 4.2-27, 4.2-31), Table 4.2-4, Appendix J.1., Section 4.1.8, 4.1.10, 4.1.12, Appendix A	No	See DR BIO-1, DR BIO-18
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;	Section 4.2 (pp. 4.2-30 to 4.2-33), Table 4.2-5, Appendix J.1., Section 3.3.2, Section 4.1.3 to 4.1.13, Appendix C, Table C 2., Table C 5., Table D 1., Appendix M.1, Appendix M.2., Appendix M.4	No	See DR BIO-1
Appendix B (g) (13) (A) (v)	species and habitats identified by local, state, and federal agencies as needing protection,	Subsection 4.2.1 to 4.2.2; Appendix J.1, Sections 2.5,	No	See DR BIO-6, DR BIO-16

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	including but not limited to those identified by the CNDDDB, California Fish and Game Code, Title 14 of the California Code of Regulations, or where applicable, in Local Coastal Programs or in relevant decisions of the California Coastal Commission or other responsible agency;	3.3, 3.4, 4.1 to 4.3, (Appendix A, B), Appendix J.2, J.3		
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;	Section 4.2, Table 4.2-3, Table 4.2-4, Appendix J.1, Section 3.3, 3.4, 4.1 to 4.3	No	See DR BIO-1
Appendix B (g) (13) (A) (vii)	plant species listed as rare under the California Native Plant Protection Act;	Section 4.2, pp. 4.2-10 to 4.2-13, Figure 4.2-2, Table 4.2-3, Subsection 4.2.2, pp. 4.2-22 to 4.2-24	No	See DR BIO-1
Appendix B (g) (13) (A) (viii)	established native resident or migratory wildlife corridors or wildlife nursery sites.	Subsection 4.2.2, pp. 4.2-19 to 4.2-21, 4.2-36 to 4.2-38, and 4.2-41	No	See DR BIO-1
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:	Section 4.2, Tables 4.2-1 to 4.2-4; Appendix J.1 (Appendix A, B, C, D) and Appendix J.3	No	See DR BIO-1
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	Appendix J.1, Figures 1 to 11, Appendix J.2, Figures 1 to 13, and Appendix J.3	No	See DR BIO-5, DR BIO-12, DR BIO-13

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	cover) and 1:350,000 (for public viewing) that show the proposed project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the CNDDDB, and the associated areas where biological surveys were conducted. Label the biological resources and survey areas as well as the project facilities.			
Appendix B (g) (13) (B) (ii)	Provide an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates. The geographical extent of the nitrogen deposition map(s) should include the entire plume and a radius of 6 (six) miles from the source, specifically identifying acres of sensitive habitat(s) within each isopleth Modeling parameters and files shall be provided.	N/A	N/A	N/A
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	Appendix J.3, Appendix J.4.; Appendix K; Appendix L	No	See DR BIO-27

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	Department of Fish and Wildlife Section 1600 et seq. permit requirements. For projects proposed to be located within the coastal zone, also provide aerial photographs or maps as described above that identify wetlands as defined by the Coastal Act and under the jurisdiction of the California Coastal Commission.			
Appendix B (g) (13) (B) (iv)	Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources.	Kiteworks	No	See DR BIO-1, DR BIO-3, DR BIO-4, DR BIO-13, DR BIO-28
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:	Subsection 4.2.1; Appendix J.1 and Appendix J.2	No	See DR BIO-1
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.)	Section 4.2, pp. 4.2-11 to 4.2-19; Appendix J.1, pp. 4 to 6, 11 to 23, (Appendix A and Appendix B)	No	See DR BIO-6, DR BIO-14, DR BIO-30
Appendix B (g) (13) (C) (iii)	Perform nitrogen deposition modeling including the complete citation for references used in	N/A	N/A	N/A

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	determining deposition rates and location. Specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry deposition. Describe habitat and species potentially affected.			
Appendix B (g) (13) (D)	A description and results of all field studies and specialized surveys (e.g., focused and protocol) used to provide biological baseline information about the project site and associated facilities. Include copies of the CNDDDB records and field survey forms completed by the applicant's biologist(s). Identify the date(s) the surveys were completed, methods used to complete the surveys, and the name(s) and qualifications of the biologists conducting the surveys. Include:	Subsection 4.2.1, Tables 4.2-3 and 4.2-4, Subsection 4.2.2; Appendix J.1, Section 3.4, Table 3, Tables C 1. to C 5, (Appendix C and Appendix D)	No	See DR BIO-6, DR BIO-7, DR BIO-14, DR BIO-17, DR BIO-18, DR BIO-30
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.	Section 3.3, Subsection 3.3.2.1, Section 3.4; Section 4.2, Subsections 4.2.1 and 4.2.2; Appendix J.1, Appendix J.2	No	See DR BIO-8, DR BIO-14, DR BIO-19, DR BIO-31
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	Section 4.2, Table 4.2-2, Tables 4.4-2 and 4.2-3; Appendix A, Figures 1 to 13; Appendix C; Appendix	No	See DR BIO-7

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J. Myrah/CDFW: M. Rodriguez,

Technical Staff: A. Rosales, E. Weiss

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	wetland status pursuant to Coastal Act or CDFW requirements, as applicable to the location, name(s) and qualifications of biologist(s) completing the delineation, the results of the delineation and a table showing jurisdictional features including state waters and wetland acreage amounts to be impacted.	J.2; Appendix J.3; Appendix K, Table 2, Table 3, Figure 7; Appendix L, Tables 2 and 3, Figure 7		
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);	Subsections 4.2.2 and 4.2.3	No	See DR BIO-1, DR BIO-14, DR BIO-23
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:	Subsection 4.2.2, pp. 4.2-20 to 4.2-39, Subsection 4.2.4; Appendix D.1, Appendix D.2	No	See DR BIO-1, DR BIO-20, DR BIO-21, DR BIO-25
Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources.	Subsection 4.2.2, pp. 4.2-20 to 4.2-39, Subsection 4.2.4; Appendix D.1 and D.2	No	See DR BIO-1, DR BIO-14, DR BIO-20, DR BIO-24
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.	Appendix D.1, Appendix D.2; Appendix E.1; Appendix J.5 and J.6	No	See DR BIO-1, DR BIO-10, DR BIO-11, DR-BIO-20 to DR BIO-22, and DR BIO-25

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete

Revision No. 0 Date: March 28, 2024

Technical Area: Biological Resources

Project: Perkins Renewable Energy Project

J. Myrah/CDFW: M. Rodriguez,

Technical Staff: A. Rosales, E. Weiss

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (13) (F) (iii)	Educational programs to enhance employee awareness during construction and operation to protect biological resources.	Subsection 4.2.2, pp. 4.2-25 and 4.2-29); Appendix K; Appendix L; Appendix M.1, M.2, M.3, M.4, and M.5	No	See DR BIO-1
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.	Subsection 4.2.4; Appendix D.1, Appendix D.2; Appendix K, Section 12A, Section 12B, Appendix M.1, M.2, M.3, M.4, M.5, and M.6	No	See DR BIO-1
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.	Section 4.2	No	See DR BIO-26
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 4.2, Tables 4.2-5 to 4.2-7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete

Revision No. 0 Date: March 28, 2024

Technical Area: Biological Resources

Project: Perkins Renewable Energy Project

J. Myrah/CDFW: M. Rodriguez,

Technical Staff: A. Rosales, E. Weiss

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix E.2	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1	No	See DR BIO-10
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.	Appendix E.2, Table 2	No	See DR BIO-26

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x

Revision No. 0 Date: March 28, 2024

Technical Area: Cultural Resources and Tribal Cultural Resources

Project: Perkins Renewable Energy Project

Technical Staff: E. Erckenbrack, S. Owen

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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;	Section 4.3, pp. 4.3-42 to 4.3-44	No	See DR CUL/TRI-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.3, pp. 4.3-28 to 4.3-42	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 4.3, Table 4.3-1, pp. 4.3-45 to 4.3-64	No	See DRs CUL/TRI-2, CUL/TRI-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 4.3, pp. 4.3-2 to 4.3-17 and 4.3-29 to 4.3-45	No	See DR CUL/TRI-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x**

Revision No. 0 Date: March 28, 2024

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Perkins Renewable Energy Project

Technical Staff: E. Erckenbrack, S. Owen

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (2)	Cultural resources and tribal cultural resources together comprise objects, buildings, structures, sites, features, 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.	Section 4.3, pp. 4.3-1, 4.3-12 to 14, and 4.3-27 to 4.3-28	Yes	
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.	Section 4.3, pp. 4.3-2 to 4.3-17	Yes	
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 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	Section 4.3, p. 4.3-36; Confidential Appendix N.1	No	See DR CUL/TRI-4 to DR CUL/TRI-14

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x**

Revision No. 0 Date: March 28, 2024

Technical Area: **Cultural Resources and Tribal Cultural Resources**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Technical Staff: E. Erckenbrack, S. Owen
 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	<p>searches to identify the above 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.</p> <p>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.</p>			

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x**

Revision No. 0 Date: March 28, 2024

Technical Area: **Cultural Resources and Tribal**

Project: Perkins Renewable Energy Project

Technical Staff: E. Erckenbrack, S. Owen

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (2) (C)	<p>The results of new cultural resource and tribal resource surveys or surveys less than 5 years old shall be provided if 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.</p> <p>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.</p> <p>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</p>	Section 4.3, pp. 4.3-28 and 4.3-29; Confidential Appendix N.2	No	See DR CUL/TRI-15

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x**

Revision No. 0 Date: March 28, 2024

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Perkins Renewable Energy Project

Technical Staff: E. Erckenbrack, S. Owen

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	<p>plant site boundaries. New historic architecture field reconnaissance (“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.</p> <p>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).</p> <p>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.</p> <p>At a minimum, the technical report shall include:</p>			

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x**

Revision No. 0 Date: March 28, 2024

Technical Area: **Cultural Resources and Tribal Cultural Resources**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Technical Staff: E. Erckenbrack, S. Owen
 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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);	Confidential Appendix N.2	No	See DR CUL/TRI-15
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;	Confidential Appendix N.2	No	See DR CUL/TRI-15
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;	Confidential Appendix N.2	No	See DR CUL/TRI-15
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	Confidential Appendix N.2	No	See DR CUL/TRI-15
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.	Confidential Appendix N.2	No	See DR CUL/TRI-15
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 vicinity, and copies	Section 4.3 pp. 4.3-41 to 4.3-42	No	See DR CUL/TRI-16

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x

Revision No. 0 Date: March 28, 2024

Technical Area: Cultural Resources and Tribal Cultural Resources
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Technical Staff: E. Erckenbrack, S. Owen
 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	Section 4.3, pp. 4.3-41 to 4.3-42	No	See DR CUL/TRI-17
Appendix B (g) (2) (D) (iii)	A written summary of any oral responses.	Section 4.3, pp. 4.3-41 to 4.3-42	Yes	
Appendix B (g) (2) (E)	Include in the discussion of proposed mitigation measures required by (g)(1):	--	--	--
Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural and tribal cultural resources;	Section 4.3, p. 4.3-43	No	See DR CUL/TRI-18
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 impacts to known cultural or tribal cultural resources; and	Section 4.3, p. 4.3-43; Appendix D.1, pp. 7, 22 to 25	Yes	
Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation to protect cultural and tribal cultural resources.	Section 4.3, p. 4.3-43; Appendix D.1, pp. 7, 22 to 23	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the	Section 4.3, p. 4.3-43, Tables 4.3-4 and 4.3-5	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x

Revision No. 0 Date: March 28, 2024

Technical Area: Cultural Resources and Tribal Cultural Resources

Project: Perkins Renewable Energy Project

Technical Staff: E. Erckenbrack, S. Owen

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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 which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 4.3, p. 4.3-45; Appendix E.1 and E.2	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 4.3, Appendix E.1	No	See DR CUL/TRI-19
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 2, p. 2.11-45; Appendix F	No	See DR CUL/TRI-20

DATA COMPLETENESS WORKSHEET

Completeness: Complete X Incomplete

Revision No. 0 Date: March 28, 2024

Technical Area: Efficiency, Energy and Energy Resources

Project: Perkins Renewable Energy Project

Technical Staff: Ardalan Sofi

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.5, p. 3-8; Section 5.1, p. 5-1	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	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	N/A	N/A
Appendix B (h) (4) (A)	Heat and mass balance diagrams for design conditions for each mode of operation.	N/A	N/A	N/A
Appendix B (h) (4) (B)	Annual fuel consumption in BTUs for each mode of operation, including hot restarts and cold starts.	Subsection 3.4.1, p. 3-7	Yes	
Appendix B (h) (4) (C)	Annual net electrical energy produced in MWh for each mode of operation including starts and shutdowns.	Subsection 2.6, p. 2.6-42; Section 3.5, p. 3-8	Yes	
Appendix B (h) (4) (D)	Number of hours the plant will be operated in each design condition in each year.	Subsection 2.6, p. 2.6-42; Section 3.5, p. 3-8	Yes	
Appendix B (h) (4) (E)	If the project will be a cogeneration facility, calculations showing compliance with applicable efficiency and operating standards.	N/A	N/A	N/A
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 5, pp. 5-1 to 5-15	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete X Incomplete _____
Efficiency, Energy and Energy Resources
 Technical Area: _____
 Project Manager: Lisa Worrall/Ann Crisp

Revision No. 0 Date: March 28, 2024

Project: Perkins Renewable Energy Project Technical Staff: Ardalan Sofi
 Docket: 24-OPT-01 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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	N/A	N/A
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	N/A	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	N/A	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	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete Revision No. 0 Date: March 28, 2024
 Technical Area: Executive Summary Project: Perkins Renewable Energy Project Technical Staff: Lisa Worrall/Ann Crisp
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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	N/A	N/A
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	N/A	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	N/A	N/A
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.	Subsection 1.6.2; Appendix C	Yes	
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.	Subsection 1.3, pp. 1-3 to 1-10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: March 28, 2024
 Technical Area: **Executive Summary** Project: Perkins Renewable Energy Project Technical Staff: Lisa Worrall/Ann Crisp
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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.	Appendix A.1, Table 1, Figures 1 to 5	Yes	
Appendix B (a) (1) (C)	A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings.	Subsection 1.3, Figures 1.3-1 and 1.3-2, pp. 1-4 to 1-7	Yes	
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.	Subsection 4.13-1, Figures 4.13-2 to 4.13-5, pp. 4.18-8 to 4.13-11; Appendix U	No	See DR VIS-2, DR VIS-3
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.	Appendix B	Yes	
Appendix B (a) (2)	Project Schedule: Proposed dates of initiation and completion of construction,	Subsection 1.5, p. 1-10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: March 28, 2024
 Technical Area: **Executive Summary** Project: Perkins Renewable Energy Project Technical Staff: Lisa Worrall/Ann Crisp
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	initial start-up, and full-scale operation of the proposed facilities.			
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.	Subsection 1.6.1, p. 1-11	Yes	
Appendix B (a) (3) (B)	A list of all owners and operators of the proposed electric transmission facilities.	Subsection 1.6.1, p. 1-11	Yes	
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).	Subsection 1.6.1, p. 1-11	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete _____
 Technical Area: **Facility Design**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Kenneth Salyphone
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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	N/A	N/A
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	N/A	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	N/A	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.	Subsection 2.1.1, p. 2.1-1 and 2.2-5; Subsection 2.3.1, pp. 2.3-7 to 2.3-8; Subsection 3.1.1, pp. 3-1 to 3.6; Section 4.4, pp. 4.4-1 to 4.4-20	Yes	
Appendix B (h) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	Subsection 2.3.1, p. 2.3-8; Subsection 3.1.2, p. 3-2; Subsection 4.4.2, pp. 4.4-8 to 4.4-20	Yes	
Appendix B (h) (1) (C)	A description of the proposed foundation types, design criteria (including derivation), analytical techniques, assumptions, loading conditions,	Subsections 1.4.3 and 1.4.4, p. 1-9; Subsection 2.3.2, p. 2.3-15; Subsection	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Facility Design
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Kenneth Salyphone
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and loading combinations to be used in the design of facility structures and major mechanical and electrical equipment.	2.3.3, p. 2.3-21; Subsection 2.4.4, p. 2.4-40		
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:	Section 1.4, pp. 1-7 to 1-10; Section 2.3 and 2.4, pp. 2.3-7 to 2.5-41; Figures 1.3-1 to 1.3-3, pp. 1-5 to 1-6; Figures 2.3-1 to 2.3-7, pp. 2.3-10 to 2.3-16; Appendix F	Yes	
Appendix B (h) (1) (D) (i)	The power generation system;	Subsection 1.4.1, pp. 1-7 to 1-8; Subsection 2.3.2, pp. 2.3-9 to 2.3-13	Yes	
Appendix B (h) (1) (D) (ii)	The heat dissipation system;	Subsection 2.3.2, p. 2.3-15; Subsection 3.2.1, pp. 3-2 to 3-3	Yes	
Appendix B (h) (1) (D) (iii)	The cooling water supply system, and, where applicable, pre-plant treatment procedures;	N/A	N/A	
Appendix B (h) (1) (D) (iv)	The atmospheric emission control system;	Subsection 4.1.2, p. 4.1-11	Yes	
Appendix B (h) (1) (D) (v)	The waste disposal system and on-site disposal sites;	Subsection 2.3.3, pp. 2.3-26 to 2.3-27	Yes	
Appendix B (h) (1) (D) (vi)	The noise emission abatement system;	Section 4.7, pp.4.7-1 to 4.7-15	Yes	
Appendix B (h) (1) (D) (vii)	The geothermal resource conveyance and re-injection lines (if applicable);	N/A	N/A	
Appendix B (h) (1) (D) (viii)	Switchyards/transformer systems; and	Subsections 1.4.6 and 1.4.7, p. 1-10; Section 2.4, pp. 2.4-34 to 2.5-41	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete _____
 Technical Area: **Facility Design**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Kenneth Salyphone
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (1) (D) (ix)	Other significant facilities, structures, or system components proposed by the applicant.	Subsections 1.4.3 and 1.44, p. 1-9; Subsection 2.3.2, p. 2.3-15 to 2.3-20	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 3.6, pp. 3-8 to 3-10	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and 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.	Appendix E.1	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained	Appendix E.2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Facility Design Project: Perkins Renewable Energy Project Revision No. 0 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: Kenneth Salyphone
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and the steps the applicant has taken or plans to take to obtain such permits.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete _____
 Technical Area: **Geological Hazards**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Michael Turner
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.4.2, pp. 4.4-8 to 4.4-9; Section 2, p. 2.4-40; Subsection 3.3.2, p. 3-3; Appendix O, pp. 28 to 29	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.4, pp. 4.4-29 to 4.4-33; Appendix O, pp. 5, 7, 8, 10, and 19	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.4, pp. 4.4-29 to 4.4-33; Appendix O, pp. 5, 7, 8, 10, and 19.	Yes	
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.	Subsection 4.4.1, 4.4.2, and 4.4.4, pp. 4.4-1 to 4.4-20; Appendix O, pp. 1 to 4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Geological Hazards
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Michael Turner
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (17) (A)	A summary of the geology, seismicity, and geologic resources of the project site and related facilities, including linear facilities.	Subsection 4.4.2, pp. 4.4-18 to 4.4-19	Yes	
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.	Subsection 4.4.1, pp. 4.4-2 to 4.4-19; Appendix O, pp. 1, 4, and 6 to 9	Yes	
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.	Subsection 4.4.1. pp. 4.4.7 to 4.4-8; Subsection 4.4.2, pp. 4.4-18 to 4.4-19	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 4.4.5, pp. 4.4-20 to 4.4-28	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Geological Hazards
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Michael Turner
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Subsection 4.4.6, p. 4.4-29; Appendix E1 and E.3, pp. 1 to 3	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 4.4.6, p. 4.4-29; Appendix E1, pp. 1 to 3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix E2, pp. 2 to 3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Hazardous Materials Handling
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.5.2, pp. 4.5-2 to 4.5-3 (second set of -2 and -3 – page numbering problem)	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.5.1	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.5.7, p 4.5-19	Yes	
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.	Subsections 4.5.1 and 4.5.2 to 4.5.5	Yes	
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as	Section 4.5, p. 4.5-5, Tables 4.5-1 to 4.5-3	No	See DR-HAZ-1 to DR-HAZ-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Hazardous Materials Handling
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	defined in California Code of Regulations, title 22, § 66261.20 et seq., and a discussion of the toxicity of each material.			
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.	N/A	N/A	N/A
Appendix B (g) (10) (C)	A discussion of the storage and handling system for each hazardous material used or stored at the site.	Subsection 4.5-1, Table 4.5-1	No	See DR-HAZ-1 to DR-HAZ-4
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	N/A	N/A
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.	Subsection 4.5.5, p. 4.5-18, Table 4.5-5	Yes	
Appendix B (g) (10) (F)	A discussion of measures proposed to reduce the risk of any release of hazardous materials.	Subsection 4.5.4, Appendix F, C-404	Yes	
Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	Subsection 4.5.2, pp. 4.5-3 to 4.5-9	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and	Subsection 4.5.5, Tables 4.5-4 to Table 4.5-6	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x**
 Technical Area: **Hazardous Materials Handling**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 4.5.6; Appendices E.1 to Appendix E.2	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 4.5.6; Appendix E.1	No	See DR-HAZ-5
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	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x**
 Technical Area: **Land Use**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Lisa Harmon
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.6.2, p. 4.6-13	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.6.1, pp. 4.6-1 to 4.6.13, Figures 4.6-1 to 4.6-6	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.6.6, pp 4.6-24 to 4.6-25	Yes	
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.	Subsections 4.6.1 to 4.6.3, pp. 4.6-3 to 4.6-21, Table 4.6-2, pp. 4.6-15 to 4.6-16	Yes	
Appendix B (g) (3) (A)	A discussion of existing land uses, general plan land use designations, and current zoning	Subsection 4.6.1, pp. 4.6-3 to 4.6-13, Table 4.6-1, p.	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete x
 Technical Area: Land Use
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Lisa Harmon
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	districts (including any overlay districts) at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include:	4.6-3; Figure 4.6-2, p. 4.6-4, Figure 4.6-3, p.4.6-5, Figure 4.6-4, p. 4.6-8		
Appendix B (g) (3) (A) (i)	An identification of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses;	Subsection 4.6.1, pp. 4.6-11 to 4.6-13, Figure 4.6-6, p. 4.6-12	No	See DR LAND-1
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;	Subsection 4.6.3, p. 4.6-20	No	See DR LAND-2
Appendix B (g) (3) (A) (iii)	Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes or developments identified in subsection (g)(3)(A)(ii); and	Subsection 4.02, pp. 4.0-2 to 4.0-9; Table 4.1, p. 4.3; Table 4.2, pp. 4.4 to 4.7 [sic], Figure 4-1, p. 4.0-8, Figure 4.2, p. 4.0-9; Subsection 4.6.3, p. 4.6-20	No	See DR LAND-3
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.	Subsection 4.6.1, Figure 4.6-2, p.4.6-4; Figure 4.6-3, p.4.6-5; Figure 4.6-4, p. 4.5-8	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete x
 Technical Area: Land Use
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Lisa Harmon
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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.	Subsection 4.6.1, pp. 4.6-3 to 4.6-7, Subsection 4.6.2, p. 4.6-15 to 4.6-18, Table 4.6-2, pp. 4.6-15 to 4.6-17	No	See DR LAND-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 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.	Subsection 4.6.1, pp. 4.6-3 to 4.6-7, Subsection 4.6.2, pp. 4.6-16 to 4.6-17; Appendix A.1, Table 1, Appendix A.2, Table 2; Appendix D.2	No	See DR LAND-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Land Use
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Lisa Harmon
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (3) (D)	A map at a scale of 1:24,000 and written description of agricultural land uses found within all areas affected by the proposed project. The description shall include:	Subsection 4.6.1, p. 4.6-7, 4.6-9, and p. 4.6-10, Figure 4.6-5, Subsection 4.6.2, pp. 4.6-18, Figure 4.6-5, p. 4.6-9	Yes	
Appendix B (g) (3) (D) (i)	Land classifications as shown on the California Department of Conservation’s Farmland Mapping and Monitoring Program’s Important Farmland maps, crop types, irrigation systems, and any special cultivation practices;	Subsection 4.6.1, p. 4.6-9, Figure 4.6-5	Yes	
Appendix B (g) (3) (D) (ii)	Whether agricultural land affected by the project was historically classified Farmland as defined by the California Department of Conservation (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland) as specified in Public Resources Code section 21060.1; and	N/A	N/A	
Appendix B (g) (3) (D) (iii)	Direct, indirect, and cumulative effects on agricultural land uses. If the proposed site or related facilities are subject to an Agricultural Land Conservation contract, provide a written copy and a discussion of the status of the expiration or canceling of such contract.	Subsection 4.6.2, pp. 4.6-18 to 4.6-20, Subsection 4.6.3, p. 4.6-20	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix	Subsection 4.6.4 [sic.], pp. 4.6-21 to 4.6-24; Table 4.6-3, pp. 4.6-21 to 4.6-22, Table 4.6-4, pp. 4.6-22, Table 4.6-5, pp. 4.6-22 to 4.6-24	No	See DR LAND-5

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Land Use
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Lisa Harmon
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	Subsection 4.6.5, p. 4.6-24; Appendix E.2, Table 2, pp. 2 to 3, Table 3, pp. 3 to 4	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1, Table 1, pp. 1 to 3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 4.6.5, p. 4.24	No	See DR LAND-6

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Noise
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: Mach 28, 2024
 Technical Staff: Kenneth Salyphone
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.7.4, p. 4.7-6	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.7.1, pp. 4.7-1 to 4.7-2, Subsection 4.7-2, pp 4.7-2 to 4.7-3, Subsection 4.7.4, p. 4.7-6	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.7.9, pp. 4.7-14 to 4.7-15	Yes	
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.	Subsections 4.7.3 to 4.7.7, pp. 4.7-3 to 4.7-13	Yes	
Appendix B (g) (4) (A)	A land use map which identifies residences, hospitals, libraries, schools, places of worship,	Figure 4.6-6, p. 4.6-12; Figure 4.7-1, p 4.7-5	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Noise
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: Mach 28, 2024
 Technical Staff: Kenneth Salyphone
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	or other facilities where quiet is an important attribute of the environment within the area impacted by the proposed project. The area potentially impacted by the proposed project is that area where, during either construction or operation, there is a potential increase of 5 dB(A) or more, over existing background levels.			
Appendix B (g) (4) (B)	A description of the ambient noise levels at those sites identified under subsection (g)(4)(A) which the applicant believes provide a representative characterization of the ambient noise levels in the project vicinity, and a discussion of the general atmospheric conditions, including temperature, humidity, and the presence of wind and rain at the time of the measurements. The existing noise levels shall be determined by taking noise measurements for a minimum of 25 consecutive hours at a minimum of one site. Other sites may be monitored for a lesser duration at the applicant's discretion, preferably during the same 25-hour period. The results of the noise level measurements shall be reported as hourly averages in Leq (equivalent sound or noise level), Ldn (day-night sound or noise level) or CNEL (Community Noise Equivalent Level) in units of dB(A). The L ₁₀ , L ₅₀ , and L ₉₀ values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time,	Subsection 4.7.3, pp. 4.7-4 to 4.7-6, Figure 4.7-1, p. 4.7-5, Table 4.7-2, p. 4.7-6	No	See DR NOISE-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Noise
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: Mach 28, 2024
 Technical Staff: Kenneth Salyphone
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	respectively) shall also be reported in units of dB(A).			
Appendix B (g) (4) (C)	A description of the major noise sources of the project, including the range of noise levels and the tonal and frequency characteristics of the noise emitted.	Table 4.7-3, p. 4.7-8	Yes	
Appendix B (g) (4) (D)	An estimate of the project noise levels, during both construction and operation, at residences, hospitals, libraries, schools, places of worship or other facilities where quiet is an important attribute of the environment, within the area impacted by the proposed project.	Subsection 4.7.4, pp. 4.7-8 to 4.7-10	No	See DR NOISE-2
Appendix B (g) (4) (E)	An estimate of the project noise levels within the project site boundary during both construction and operation and the impact to the workers at the site due to the estimated noise levels.	Subsection 4.7.4, pp. 4.7-8 to 4.7-10	Yes	
Appendix B (g) (4) (F)	The audible noise from existing switchyards and overhead transmission lines that would be affected by the project and estimates of the future audible noise levels that would result from existing and proposed switchyards and transmission lines. Noise levels shall be calculated at the property boundary for switchyards and at the edge of the rights-of-way for transmission lines.	Subsection 4.7.4, pp. 4.7-8 to 4.7-10	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and	Subsection 4.7.7, pp 4.7-13 to 4.7-14	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Noise**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: Mach 28, 2024
 Technical Staff: Kenneth Salyphone
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	Appendix E.1	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix E.2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: **Paleontological Resources**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Michael Turner
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.8.2, pp. 4.8-3 to 4.8.5; Appendix Q, p. 10	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.8.2, pp. 4.8-3 to 4.8.5; Appendix Q, p. 10	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.8.7, pp. 4.8-13 to 4.8-14; Appendix Q, pp. 22 to 23	Yes	
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.	Subsection 4.8.1, pp. 4.8-1 to 4.8-3; Subsection 4.8.2, pp. 4.8-2 to 4.8-3 and pp. 4.8-5 to 4.8-8; Subsection 4.8.3, pp. 4.8-8 to 4.8-3; Subsection 4.8.4, pp. 4.8-9 to 4.8-10	Yes	
Appendix B (g) (16) (A)	Identification of the physiographic province and a brief summary of the geologic setting,	Subsection 4.8.2, pp. 4.8-3 to 4.8.5; Appendix Q, p. 10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete _____
 Technical Area: Paleontological Resources
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Michael Turner
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	formations, and stratigraphy of the project area. The size of the paleontological study area may vary depending on the depositional history of the region.			
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.	Subsection 4.8.2, pp. 4.8-3 to 4.8-8; Appendix Q, pp. 15 to 21	Yes	
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.	Subsection 4.8.1, pp. 4.8-3; Appendix Q, p. 2 and pp. 16 to 17	Yes	
Appendix B (g) (16) (D)	Information on the specific location of known palaeontologic resources, survey 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	Subsection 4.8.1, p. 4.8-3; Subsection Appendix Q, pp. 16 to 17	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete _____
 Technical Area: **Paleontological Resources**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Michael Turner
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	confidentiality, pursuant to California Code of Regulations, title 20, section 2501 et seq.			
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.	Subsection 4.8.4, pp. 4.8-9 to 4.8-10	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 4.8.5, pp. 4.8-10 to 4.8-12	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 4.8.6, p. 4.8-12; Appendix E1, pp. 1 to 3; Appendix E2, pp. 2 to 3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete _____
 Technical Area: **Paleontological Resources**
 Project Manager: Lisa Worrall/Ann Crisp

Revision No. 0 Date: March 28, 2024
 Project: Perkins Renewable Energy Project Technical Staff: Michael Turner
 Docket: 24-OPT-01 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 4.8.6, p. 4.8-12; Appendix E1, pp. 1 to 3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix E2, pp. 2 to 3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Project Description
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Lisa Worrall/Ann Crisp
 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (1)	In a section entitled, "Generation Facility Description, Design, and Operation" provide:			
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;	Appendix A, Figures 6 to 11	No	See DR PD-4, DR PD-5
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);	Subsection 2.3.2, Figures 2.3-1 and 2.3-2	Yes	
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	Subsection 2.3.2, pp. 2.3-12 to 2.3-19, Subsection 2.3.3, Table 2.3-2, pp. 2.3-21 to 2.3-28	Yes	
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.	Subsection 2.3, pp. 2.3-7 to 2.3-8; Subsection 5.1, pp. 5-1 to 5-3, Figure 2.3.1, Figure 2.3.2, Figure 2.3.8	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Project Description
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Lisa Worrall/Ann Crisp
 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (2)	In a section titled, "Transmission Lines Description, Design, and Operation" provide:	--	--	--
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 route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s);	Figure 4.6-6	No	See DR PD-5
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.	Figure 3.15-5	No	See DR VIS-2, DR VIS-3
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.	Subsection 2.3.3, p. 2.3-23; Subsection 2.4, pp. 2.4-34 to 2.5-41	Yes	
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	Subsection 2.4.2, p. 2.4-37 to 2.4-38	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Project Description
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Lisa Worrall/Ann Crisp
 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	constraints, and electric transmission constraints; and			
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	Subsection 2.5, pp. 2.5-41 to 2.6-42	No	See DR BIO-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Public Health
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Wenjun Qian
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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.	Section 4.9, Subsection 4.9.2, pp. 4.9-4 to 4.9-6	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.9, Subsection 4.9.1, pp. 4.9-1 to 4.9-4	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.9, Subsection 4.9.7, p. 4.9-10	Yes	
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, Subsections 4.9.1, 4.9.2, 4.9.3, pp. 4.9-1 to 4.9-6	No	See DR PH-2 and DR PH-3
Appendix B (g) (9) (A)	An assessment of the potential risk to human health from the project’s hazardous air	Section 4.9, Subsection 4.9.2, pp. 4.9-4 to 4.9-6	No	See DR PH-2, DR PH-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Public Health
 Project Manager: Lisa Worrall/Ann Crisp

Revision No. 0 Date: March 28, 2024
 Project: Perkins Renewable Energy Project Technical Staff: Wenjun Qian
 Docket: 24-OPT-01 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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).			
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.	Section 4.9, Subsection 4.9.2, pp. 4.9-4 to 4.9-6	No	See DR PH-3
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.	Section 4.9, Subsection 4.9.1, pp. 4.9-1 to 4.9-4	Yes	
Appendix B (g) (9) (D)	A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).	Section 4.9, Subsection 4.9.1, p. 4.9-2	No	See DR PH-1
Appendix B (g) (9) (E)	For this section, the following definitions apply:	--	--	--
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 4.9, Subsection 4.9.1, p. 4.9-2	Yes	
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 4.9, Subsection 4.9.1, p. 4.9-3	No	See DR PH-2 and DR PH-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Public Health
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Wenjun Qian
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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 4.9, Subsection 4.9.1, p. 4.9-3	No	See DR PH-2 and DR PH-3
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, Subsection 4.9.5, Table 4.9-1, Table 4.9-2, Table 4.9-3, pp. 4.9-7 to 4.9-9	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and 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 E.2, Table 2, Table 3	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1, Table 1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained	Appendix E.2, Table 2, Table 3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Public Health
 Project Manager: Lisa Worrall/Ann Crisp

Revision No. 0 Date: March 28, 2024
 Project: Perkins Renewable Energy Project Technical Staff: Wenjun Qian
 Docket: 24-OPT-01 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and the steps the applicant has taken or plans to take to obtain such permits.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete
 Technical Area: Reliability
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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	N/A	N/A
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	N/A	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	N/A	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.	Subsection 3.4.1, p. 3-7	Yes	
Appendix B (h) (3) (B)	A discussion of the anticipated service life and degree of reliability expected to be achieved by the proposed facilities on consideration of:	Section 3.4, pp. 3-7 to 3-8	Yes	
Appendix B (h) (3) (B) (i)	Expected overall availability factor, and annual and lifetime capacity factors;	Subsection 3.4.2, pp. 3-7 to 3-8	Yes	
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	Section 2, pp. 2.1-1 to 2.8-43; Section 3.4, pp. 3-7 to 3-8	Yes	

DATA COMPLETNESS WORKSHEET

Completeness: Complete x Incomplete
 Technical Area: Reliability
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	conveyance lines, and the waste disposal system;			
Appendix B (h) (3) (B) (iii)	Geologic and flood hazards, meteorologic conditions and climatic extremes, and cooling water availability;	Section 4.4, pp. 4.4-1 to 4.4-8; Subsection 4.15.1, pp. 4.15-8 to 4.15-9	Yes	
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	Subsection 2.3.2, p. 2.3-19; Subsection 3.2.1, pp. 3-2 to 3-3; Subsection 3.4.3, p. 3-8	Yes	
Appendix B (h) (3) (B) (v)	For technologies not previously installed and operated in California, the expected power plant maturation period.	N/A	N/A	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	N/A	N/A
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	N/A	N/A	N/A

DATA COMPLETNESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Reliability
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	N/A	N/A	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	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete Revision No. 0 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.10.2, pp. 4.10-41 to 4.10-44	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.10.2, pp. 4.10-41 to 4.10-44	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.10.7, pp. 4.10-77 to 4.10-79	Yes	
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.	Subsections 4.10 1 to 4.10.7	No	See DR SOCIO-1 to DR SOCIO-6

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x** Revision No. 0 Date: March 28, 2024
 Technical Area: **Socioeconomics** Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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:	Subsection 4.10.1, pp. 4.10-1 to 4.10-41	No	See DR SOCIO-1 to DR SOCIO-6
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;	Subsection 4.10.1, p. 4.10-6, p. 4.10-9; p.4.10-11, Table 4.10-1, p. 4-10-8, Table 4.10-2, p. 4.10-10	No	See DR SOCIO-1
Appendix B (g) (7) (A) (ii)	The social characteristics, including population and demographic and community trends;	Subsection 4.10, pp. 4.10-1 to 4.10-5, pp. 4.10-31 to 4.10-41, Figure 4.10-1, p. 4.10-2, Figure 4.10-2, p. 4.10-2, Figure 4.10-3, p. 4.10-3, Figure 4.10-4, p. 4.10-4, Figure 4.10-5, p. 5.10-5, Figure 4.10-6, p. 4.10-5, Table 4.10-18, p. 4.10-32, Figure 4.10-25, p. 4.10-33, Table 4.10-19, pp. 4.10-35 to 4.10-36, Table 4.10-20, p. 4.10-36, Figure 4.10-26, p. 4.10-37, Figure 4.10-27, p. 4.10-38, Figure 4.10-28, p. 4.10-39, Table 4.10-21, p. 4.10-40, Table 4. 10-22, p. 4.10-41	No	See DR SOCIO-2
Appendix B (g) (7) (A) (iii)	Existing and projected unemployment rates;	Subsection 4.10.1, pp. 4.10-6 to 4.10-10, Table 4.10-7, p. 4.10-6, Table 4.10-8, p. 4.10-7, Table 4.10-10, p. 4.10-9, Table 4.10-11, p. 4.10-9	No	See DR SOCIO-3
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by occupation required for construction and operation of the project;	Subsection 4.10.2, pp. 4.10-44 to 4.10-46	Yes	
Appendix B (g) (7) (A) (v)	Availability of temporary and permanent housing and current vacancy rate; and	Subsection 4.10.1, pp. 4.10-12 to 4.10-24, Figure 4.10-13, p. 4.10-12, Table	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete Revision No. 0 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		4.10-3, p. 4.10-13, Figure 4.10-14, p. 4.10-13; Table 4.10-4, p. 4.10-14, Figure 4.10-15, p. 4.10-15, Table 4.10-5, p. 4.10-15, Figure 4.10-16, p. 4.10-16, Table 4.10-6, p. 4.10-16		
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 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.	Subsection 4.10.1, pp. 4.10-24 to 4.10-31; Table 4.10-9, pp. 4.10-24 to 4.10-25, Table 4.10-10, p. 4.10-25, Table 4.10-11, p. 4.10-25, Table 4.10-12, p. 4.10-27, Table 4.10-13, p. 4.10-28, Table 4.10-14, p. 4.10-28, Table 4.10-15, p. 4.10-28, Table 4.10-16, p. 5.10-29, Table 4.10-17, p. 4.10-30	Yes	
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:	Subsection 4.10.2, pp. 4.10-41 to 4.10-72	Yes	
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;	Subsection 4.10.2, pp. 4.10-44 to 4.10.46	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete Revision No. 0 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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;	Subsection 4.10.2, pp. 4.10-46 to 4.10-48	Yes	
Appendix B (g) (7) (B) (iii)	An estimate of the potential population increase caused directly and indirectly by the project;	Subsection 4.10.2, pp. 4.10-46 to 4.10-48	Yes	
Appendix B (g) (7) (B) (iv)	The potential impact of population increase on housing during the construction and operations phases;	Subsection 4.10.2, pp. 4.10-46 to 4.10-48	Yes	
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;	Subsection 4.10.2, pp. 4.10-48 to 4.10-5, pp. 4.10-62 to 4.10.65	Yes	
Appendix B (g) (7) (B) (vi)	An estimate of applicable school impact fees;	Subsection 4.10	No	See DR SOCIO-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete Revision No. 0 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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;	Subsection 4.10.2, pp. 4.10-52 to 4.10-56, Table 4.10-23, p. 4.10-52, Table 4.10-24, p. 4.10-53, Table 4.10-25, p. 4.10-53, Table 4.10-29, p. 4.10-56, Table 4.10-30, p. 4.10-56	No	See DR SOCIO-5
Appendix B (g) (7) (B) (viii)	An estimate of the expenditures for locally purchased materials for the construction and operation phases of the project;	Subsection 4.10.2, pp. 4.10-52 to 4.10-56, Table 4 4.10-23, p. 4.10-52, Table 4.10-24, p. 4.10-53, Table 4.10-25, p. 4.10-53, Table 4.10-29, p. 4.10-56, Table 4.10-30, p. 4.10-56	No	See DR SOCIO-5
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost (plant and equipment) of the project;	Subsection 4.10.2, pp. 4.10-52 to 4.10-53, Table 4 4.10-23, p. 4.10-52, Table 4.10-24, p. 4.10-53, Table 4.10-25, p. 4.10-53	No	See DR SOCIO-5
Appendix B (g) (7) (B) (x)	An estimate of sales taxes generated during construction and separately during an operational year of the project;	Subsection 4.10.2, pp. 4.10-58 to 4.10-62, Table 4.10-34, p. 4.10-59, Table 4.10-36, p. 4.10-61	No	See DR SOCIO-5
Appendix B (g) (7) (B) (xi)	An estimate of property taxes generated during an operational year of the project;	Subsection 4.10.2, pp. 4.10-59 to 4. 10-60	No	See DR SOCIO-5, DR SOCIO-6
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	Subsection 4.10.2, pp. 4.10-52 to 4.10-58, Table 4.10-28, p. 4.10-55; Table 4.10-31, p. 4.10-56	No	See DR SOCIO-5
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.	Subsection 4.10.2, pp. 4.10-67 to 4.10-72	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete Revision No. 0 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 4.10.5, pp. 4.10-75 to 4.10-77, Table 4.10-38, pp. 4.10-75 to 4.10-76, Table 4.10-39, p. 4.10-76, Table 4.10-40, p. 4.10-77	No	See DR SOCIO-7
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 4.10.6, p. 4.10-77; Appendix E, Table E.2	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 4.10.6, p. 4.10-77; Appendix E.1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete Revision No. 0 Date: March 28, 2024
 Technical Area: Socioeconomics Project: Perkins Renewable Energy Project Technical Staff: Lisa Harmon
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	taken or plans to take to obtain such permits.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete
 Technical Area: Soils
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2023
 Technical Staff: Michael Turner
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.4.1, pp. 4.8-8 to 4.4-9; Subsection 4.6.1, p. 4.6-13; Subsection 4.11.1, p. 4.11-10	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.4.2, pp. 4.8-8 to 4.4-9; Subsection 4.6.2, p. 4.6-13; Subsection 4.6.1, p. 4.6-3 to 4.6-13; Subsection 4.11.1, p. 4.11-1 to 4.11-9; Subsection 4.11.2, p. 4.11-10; Appendix O, pp. 11 to 12	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.6.6, pp. 4.6-24 to 4.6-26; Subsection 4.4.7, pp. 4.4-29 to 4.4-33; Subsection 4.11.6, pp. 4.11-19 to 4.11-20; Subsection 4.6.6, pp. 4.6-24 to 4.6-26	Yes	
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	Subsection 4.6.1, pp. 4.6-1 to 4.11-13; Subsection 4.6.2, pp. 4.6-13 to 4.6-20; Subsection 4.6.3, pp. 4.6-20 to 4.6-21; Subsection 4.11.1, pp. 4.11-1 to 4.11-6; Subsection 4.11.2, pp. 4.11-10 to 4.11-15; Subsection 4.11.3, pp. 4.11-16 to 4.11-17	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete
 Technical Area: Soils
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2023
 Technical Staff: Michael Turner
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	materials used such as general plan or other adopted local, regional, or statewide plan.			
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:	Subsection 4.6.1, pp. 4.6-3 to 4.6-9; Subsection 4.11, pp. 4.11-1 to 4.11-6	Yes	
Appendix B (g) (15) (A) (i)	The depth, texture, permeability, drainage, erosion hazard rating, and land capability class of the soil;	Subsection 4.11.1, pp. 4.11-2 to 4.11-7	Yes	
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 pollutants in the soil-vegetation system;	Subsection 4.11.1, pp. 4.11-8 to 4.11-9; Appendix O, pp. 4 to 5 and pp. 7 to 8	Yes	
Appendix B (g) (15) (A) (iii)	The location of any proposed fill disposal or fill procurement (borrow) sites; and	Subsection 4.4.2, p. 4.4-15; Appendix O, p. 12	Yes	
Appendix B (g) (15) (A) (iv)	The location of any contaminated soils that could be disturbed by project construction.	Appendix P, pp. 5.3 to 5.5	Yes	
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:	--	--	--
Appendix B (g) (15) (B) (i)	The quantification of accelerated soil loss due to wind and water erosion; and	Subsection 4.11.1, p. 4.11-7 and p. 4.11-9; Subsection 4.11.2, pp. 4.11-10 to 4.11-14	Yes	
Appendix B (g) (15) (B) (ii)	The effect of power plant emissions on surrounding soil-vegetation systems.	Subsection 4.1.1, p. 4.1-3	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and	Subsection 4.6.4, pp. 4.6-21 to 4.6-24; Subsection	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete
 Technical Area: Soils
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2023
 Technical Staff: Michael Turner
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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	4.11.5, pp. 4.11-18 to 4.11-19		
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 4.6.5, p. 4.6-24; Subsection 4.11.6, p. 4.11-19	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 4.11.6. p. 4.11-19; Appendix E1, pp. 1 to 3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix E2, pp. 2 to 4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Traffic and Transportation**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Chuck Huffine
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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.	Section 4.12, Subsection 4.12.2, pp. 4.12-11 to 4.12-25	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.12, Subsections 4.12.1 – 4.12.7, pp. 4.12-1 to 4.12-28	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.12, Subsection 4.12.7, pp. 4.12-27 to 4.12-28	Yes	
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 4.12, Subsections 4.12.1 to 4.12.4, pp. 4.12-1 to 4.12-25	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Traffic and Transportation**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Chuck Huffine
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
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.	Section 4.12, Subsection 4.12.1, pp. 4.12-1 to 4.12-7	Yes	
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 4.12, Subsection 4.12.1, p. 4.12-9	Yes	
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.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x** _____
 Technical Area: **Traffic and Transportation**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Chuck Huffine
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (5) (B) (ii)	A thermal plume analysis that describes the plume's velocity;	N/A	N/A	N/A
Appendix B (g) (5) (B) (iii)	A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and	N/A	N/A	N/A
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.	N/A	N/A	N/A
Appendix B (g) (5) (C)	An evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include:	--	--	--
Appendix B (g) (5) (C) (i)	The local jurisdiction's thresholds of significance;	Section 4.12, Subsection 4.12.2, p. 4.12-16	Yes	
Appendix B (g) (5) (C) (ii)	Methodologies (such as local VMT Evaluation Tool);	Section 4.12, Subsection 4.12.2, pp. 4.12-12 to 4.12-17	No	See DR TRANS-1
Appendix B (g) (5) (C) (iii)	VMT heat maps; and	Section 4.12, Subsection 4.12.2, pp. 4.12-16 to 4.12-17	No	See DR TRANS-1
Appendix B (g) (5) (C) (iv)	Transportation demand management plans and any documents supporting the project applicant's CEQA determination.	Section 4.12, Subsection 4.12.4, p. 4.12-25	No	See DR TRANS-1
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	--	--	--

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Traffic and Transportation**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Chuck Huffine
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	facility. For each road identified, include the following, where applicable:			
Appendix B (g) (5) (D) (i)	Road classification and design capacity;	Section 4.12, Subsection 4.12.1, pp. 4.12-1 to 4.12-8	Yes	
Appendix B (g) (5) (D) (ii)	Current daily average and peak traffic counts;	Section 4.12, Subsection 4.12.1, p. 4.12-10; Appendix T	Yes	
Appendix B (g) (5) (D) (iii)	Current and projected levels of service before project development, during construction, and during project operation;	Section 4.12, Subsection 4.12.1, p. 4.12-10, pp. 4.12-12, 4.12-17; Appendix T	Yes	
Appendix B (g) (5) (D) (iv)	Weight and load limitations;	Section 4.12, Subsection 4.12.1, pp. 4.12-10 to 4.12-11	Yes	
Appendix B (g) (5) (D) (v)	Estimated percentage of current traffic flows for passenger vehicles and trucks; and	Section 4.12, Subsection 4.12.1, p. 4.12-10; Appendix T	Yes	
Appendix B (g) (5) (D) (vi)	An identification of any road features affecting public safety.	Section 4.12, Subsection 4.12.3, p. 4.12-24	Yes	
Appendix B (g) (5) (E)	An assessment of the construction and operation 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:	Section 4.12, Subsection 4.12.3, p. 4.12-24	No	See DR TRANS-2
Appendix B (g) (5) (E) (i)	Estimated one-way trip lengths for workers, deliveries, and truck haul trips	Section 4.12, Subsection 4.12.2, pp. 4.12-16 to 4.12-20	No	See DR TRANS-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Traffic and Transportation**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Chuck Huffine
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	generated by the construction of the project.			
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.	Section 4.12, Subsection 4.12.2, pp. 4.12-11 to 4.12-25	No	See DR TRANS-4
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.	Section 4.12, Subsection 4.12.2, pp. 4.12-21 to 4.12-23	No	See DR TRANS-5
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 4.12, Subsection 4.12.5, pp. 4.12-26 to 4.12-27	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and	Section 4.12, Subsection 4.12.6, p. 4.12-27; Appendix E.1	No	See DR TRANS-6

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Completeness: Complete _____ Incomplete **x**
 Technical Area: **Traffic and Transportation**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Chuck Huffine
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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 4.12, Subsection 4.12.6, p. 4.12-27; Appendix E.1	No	See DR TRANS-6
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 4.12, Subsection 4.12.6, p. 4.12-27; Appendix E.2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete _____
Transmission System Safety and Nuisance
 Technical Area: _____
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Sudath Edirisuriya
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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.	Section 2.4, pp 2.4-34 to 2.4-40; Subsection 3.3.5, pp 3.3-4 to 3.3-6	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.3.5; Section 3.7	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section.3.7; Subsection 3.3.5	Yes	
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 2.4, pp 2.4-34 to 2.4-40; Subsection 3.3.5; Sections 4.7 and 4.17	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete _____
Transmission System Safety and Nuisance
 Technical Area: _____
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Sudath Edirisuriya
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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.	Section 2, Subsections 2.4.1 and 3.3.3	Yes	
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.	Subsection 3.3.5	Yes	
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.	Subsection 3.3.5; Sections 4.7 and 4.17	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law	Subsection 3.6, Table 3.6-1- 3.6-2; Sections 4.1 to 4.18	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete _____
Transmission System Safety and Nuisance
 Technical Area: _____
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Sudath Edirisuriya
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	Section 3.6, Tables 3.6-1 and 3.6-2	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 2.10; Appendix E	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x** Revision No. 0 Date: March 28, 2024
 Technical Area: **Transmission System Design** Project: Perkins Renewable Energy Project Technical Staff: Sudath Edirisuriya
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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.	Section 2, Subsection 2.4, pp 2.4-34 to 2.4-40	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 2, Subsection 2.4	No	See DR TSD-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Subsection 3.7	Yes	
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 2, Subsections 2.1.1, 2.3.1, and 2.4, pp 2.4-34 to 2.4-40, Figures 2.3-1 to 2.3-5	Yes	
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.	Section 2, Subsections 2.1.1, 2.3.1, and 2.4, pp 2.4-34 to 2.4-40, Figures 2.3-1 to 2.3-5	Yes	
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	Section 2, Subsection 2.4, pp. 2.4-34 to 2.4-40	No	See DR TSD-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x** Revision No. 0 Date: March 28, 2024
 Technical Area: Transmission System Design Project: Perkins Renewable Energy Project Technical Staff: Sudath Edirisuriya
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.			
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.	Section 2, Subsection 2.4, pp 2.4-34 to 2.4-40	Yes	
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 an transmission system that is not 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.	Section 2, Subsection 2.4, pp. 2.4-34 to 2.4-40	No	See DR TSD-3, TSD-4
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	Subsection 3.6, Tables 3.6-1 and 3.6-2; Sections 4.1 to 4.18	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **x** Revision No. 0 Date: March 28, 2024
 Technical Area: **Transmission System Design** Project: Perkins Renewable Energy Project Technical Staff: Sudath Edirisuriya
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	Subsection 3.6, Table 3.6-1 and 3.6-2	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 2.10; Appendix E	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 2, Subsection 2.4, pp 2.4-34 to 2.4-40	No	See DR TSD-5

Completeness: Complete _____ Incomplete **x** **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: March 28, 2024
 Technical Area: **Visual Resources** Project: Perkins Renewable Energy Project Technical Staff: David Tatsumi
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr/David Tatsumi

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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.	Section 4.13.1, pp 4.13-1 to 4.13-13	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 4.13, pp 4.13-18 to 4.13-24	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 4.13.7, p 4.13-27	Yes	
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 4.13	Yes	

Completeness: Complete _____ Incomplete **x** **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: March 28, 2024
 Technical Area: **Visual Resources** Project: Perkins Renewable Energy Project Technical Staff: David Tatsumi
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr/David Tatsumi

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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 4.13, p 4.13-5	Yes	
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 one-mile radius of a project-related linear facility. Include:	Section 4.13, p 4.13-5	Yes	
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 4.13, p 4.13-5	Yes	
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 4.13, pp 4.13-3, 4.13-5	Yes	
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 4.13, pp 4.13-4 and 4.13-5	Yes	
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	Section 4.13, pp 4.13-4 and 4.13-5	Yes	

Completeness: Complete _____ Incomplete **x** **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: March 28, 2024
 Technical Area: Visual Resources Project: Perkins Renewable Energy Project Technical Staff: David Tatsumi
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr/David Tatsumi

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	to real property) of a scenic vista and scenic resource? Is the project situated so that it changes the visual 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 4.13, p 4.13-16	Yes	
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 4.13, pp 4.13-25 to 4.13-27	Yes	
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:	Section 4.13, p 4.13-19	Yes	
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. Objects of aesthetic significance are the primary focus in the KOP selection.	Section 4.13, p 4.13-4, Figure 4.13-1	Yes	
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	N/A	N/A	N/A

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Visual Resources**

DATA COMPLETENESS WORKSHEET
 Project: Perkins Renewable Energy Project

Revision No. 0 Date: March 28, 2024

Technical Staff: David Tatsumi

Steven Kerr/David

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Tatsumi

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.			
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.	Section 4.13-2, pp 4.13-8 to 4.13-11	No	See DR VIS-1
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 construction (existing condition plus proposed project).	Section 4.13.2, pp 4.13-15	No	See DR VIS-2
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.	Kiteworks	No	See DR VIS-3
Appendix B (g) (6) (C) (vi)	Provide a copy of the KOP photograph(s) and photo-realistic simulation(s) in an electronic file.	Kiteworks	No	See DR VIS-3
Appendix B (g) (6) (D)	Show and describe the project in the landscape.	Table 4.13-6, 4.13-2, p 4.13-15 to 24	Yes	

Completeness: Complete _____ Incomplete **x** **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: March 28, 2024
 Technical Area: **Visual Resources** Project: Perkins Renewable Energy Project Technical Staff: David Tatsumi
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr/David Tatsumi

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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 F Site Plan Part 2, Table 4.13-2	Yes	
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.	Table 4.13-2, p. 4.13-15 to 4.13-16	Yes	
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.	Table 4.13-2, p. 4.13-15 to 4.13-16	Yes	
Appendix B (g) (6) (D) (iv)	Provide a project specific conceptual landscape design plan that conforms with the city municipal code or county government code. Include:	Table 4.13-6, 4.13.2 p 4.13-15 to 24	Yes	
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.	Table 4.13-6, 4.13.2 p 4.13-15 to 24	Yes	
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.	Table 4.13-6, 4.13.2 p 4.13-15 to 24	Yes	
Appendix B (g) (6) (D) (v)	Provide a project specific conceptual outdoor lighting control and management plan (lighting	4.13.2, p 4.13-16	No	See DR VIS-4

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Visual Resources**

DATA COMPLETENESS WORKSHEET

Revision No. 0 Date: March 28, 2024

Project: Perkins Renewable Energy Project Technical Staff: David Tatsumi

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01 Technical Senior: Tatsumi

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	plan) and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code.			
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 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.	Appendix F Site Plan Part 2	No	See DR VIS-5
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).	Table 4.13-2, p. 4.13-15 to 4.13-16	Yes	
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	N/A	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	N/A	N/A

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Visual Resources**

DATA COMPLETENESS WORKSHEET
 Project: Perkins Renewable Energy Project

Revision No. 0 Date: March 28, 2024

Technical Staff: David Tatsumi

Steven Kerr/David

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Technical Senior: Tatsumi

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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	N/A	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.	Section 4.13, p 4.13-17	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 4.13-4, p. 4.13-25 to 4.13-2	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and 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.	Table 4.13-4, p. 4.13-25 to 4.13-27	Yes	

Completeness: Complete _____ Incomplete **x** **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: March 28, 2024
 Technical Area: Visual Resources Project: Perkins Renewable Energy Project Technical Staff: David Tatsumi
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Senior: Steven Kerr/David Tatsumi

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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.	Subsection 4.13.6	No	See DR VIS-6
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 4.13.6	No	See DR VIS-7

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete
 Technical Area: **Waste Management**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Adam White/ Paul Miller
 Abdel-Karim Abulaban/ Brett
 Technical Senior: Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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	N/A	N/A
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	N/A	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;	Subsection 4.14	Yes	
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.	Subsection 4.14	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Waste Management

Project: Perkins Renewable Energy Project

Revision No. 0 Date: March 28, 2024

Technical Staff: Adam White/ Paul Miller

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Abdel-Karim Abulaban/ Brett

Technical Senior: Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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.	Subsection 4.14.1; Appendix P	Yes	
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 Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.	Table 4.14-4 and Table 4.14-5, p. 4.14-7 to 4.14-11	Yes	
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	Table 4.14-6, p. 4.14-11 to 4.14-12	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Waste Management

Project: Perkins Renewable Energy Project

Revision No. 0 Date: March 28, 2024

Technical Staff: Adam White/ Paul Miller

Project Manager: Lisa Worrall/Ann Crisp

Docket: 24-OPT-01

Abdel-Karim Abulaban/ Brett

Technical Senior: Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.			
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.	Subsection 4.14.2	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 4.14.4	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive	Appendix E.2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Waste Management Project: Perkins Renewable Energy Project Revision No. 0 Date: March 28, 2024
 Project Manager: Lisa Worrall/Ann Crisp Docket: 24-OPT-01 Technical Staff: Adam White/ Paul Miller
 Technical Senior: Abdel-Karim Abulaban/ Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	N/A	N/A	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	N/A	N/A

DATA ADEQUACY WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Water Resources
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: James Ackerman
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.15, pp. 4.15-1 to 4.15-35	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 4.15, pp. 4.15-1 to 4.15-35	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 4.15.7, pp. 4.15-34 and 4.15-35	Yes	
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.	Subsection 4.15.1, pp. 4.15-1 to 4.15-11; Subsection 4.15.2, pp. 4.15-11 to 4.15-27; Subsection 4.15.3, pp. 4.15-27 to 4.15-29; Subsection 4.15.4, pp. 4.15-29 to 4.15-30; Appendix D1, pp. 9,12,13,17,21 and 25 and 27. Appendix D2, pp. 2 to 4,7,30 to 35; Appendix M.5, Appendix M.6	No	See DR WATER-3 and DR WATER-4
Appendix B (g) (14) (A)	All the information required to apply for the following permits, if applicable, including:	Appendix L and Perkins RWQCB WDR Application	Yes	
Appendix B (g) (14) (A) (i)	Waste Discharge Requirements; National Pollutant Discharge Elimination System	Appendix L and Perkins RWQCB WDR Application	No	See DR-WATER-5

DATA ADEQUACY WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Water Resources**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: James Ackerman
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Permit; and/or a Section 401 Certification or Waiver from the appropriate Regional Water Quality Control Board (RWQCB);			
Appendix B (g) (14) (A) (ii)	Construction and Industrial Waste Discharge or Industrial Pretreatment permits from wastewater treatment agencies;	Appendix L and Perkins RWQCB WDR Application	No	See DR-WATER-5
Appendix B (g) (14) (A) (iii)	Nationwide Permits and/or Section 404 Permits from the U.S. Army Corps of Engineers; and	N/A	N/A	N/A
Appendix B (g) (14) (A) (iv)	Underground Injection Control Permit(s) from the U.S. Environmental Protection Agency, California Division of Oil and Gas, and RWQCB.	N/A	N/A	N/A
Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The 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:	Subsection 4.15.1, pp. 4.15-5 to 4.15-6, Appendix G	Yes	
Appendix B (g) (14) (B) (i)	Ground water bodies and related geologic structures;	Subsection 4.15.1, pp. 4.15-1 to 4.15-5	Yes	
Appendix B (g) (14) (B) (ii)	Surface water bodies;	Subsection 4.15.1, p. 4.15-5, Appendix G	Yes	
Appendix B (g) (14) (B) (iii)	Water inundation zones, such as the 100-year flood plain and tsunami run-up zones;	Subsection 4.15.1, pp. 4.15-9 to 4.15-11	Yes	
Appendix B (g) (14) (B) (iv)	Flood control facilities (existing and proposed); and	N/A	N/A	N/A
Appendix B (g) (14) (B) (v)	Groundwater wells within ½ mile if the project will include pumping.	Subsection 4.15.1, p. 4.15-5	Yes	

DATA ADEQUACY WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Water Resources**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: James Ackerman
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (C)	A description of the water to be used and discharged by the project. This information shall include:	Subsection 1.4.3, p. 1-9; Subsection 2.3.2, p. 2.3-16, Subsection 2.3.3, p. 2.3-25, Subsection 2.3.4, p. 2.3-31	Yes	
Appendix B (g) (14) (C) (i)	Source(s) of the primary and back-up water supplies and the rationale for their selection;	Subsection 1.4.3, p. 1-9; Subsection 2.3.3, pp. 2.3-25 to 2.3-26, Subsection 2.3.4, p. 2.3-31	Yes	
Appendix B (g) (14) (C) (ii)	The expected physical and chemical characteristics of the source and discharge water(s) including identification of both organic and inorganic constituents before and after any project-related treatment. For source waters with seasonal variation, provide seasonal ranges of the expected physical and chemical characteristics. Provide copies of background material used to create this description (that is, laboratory analysis);	Subsection 4.15.1, p. 4.15-4	No	See DR WATER-4
Appendix B (g) (14) (C) (iii)	Average and maximum daily and annual water demand and waste water discharge for both the construction and operation phases of the project;	Subsection 2.3.3, p. 2.3-25; Subsection 4.14-3, Table 4.14-4, p. 4.14-7, Table 4.14-5, p. 4.14-9; Subsection 4.15-2, pp. 4.15-17 to 4.15-20	Yes	
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	Subsection 2.3.2, p. 2.3-19	Yes	

DATA ADEQUACY WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Water Resources
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: James Ackerman
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	treatment, and wastewater discharge. Include a water mass balance diagram;			
Appendix B (g) (14) (C) (v)	For all water supplies intended for industrial uses to be provided from public or private water purveyors, a letter of intent or will-serve letter indicating that the purveyor is willing to serve the project, has adequate supplies available for the life of the project, and any conditions or restrictions under which water will be provided. If a will-serve letter or letter of intent cannot be provided, identify the most likely water purveyor and discuss the necessary assurances from the water purveyor to serve the project;	N/A	N/A	N/A
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);	N/A	N/A	N/A
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.	N/A	N/A	N/A

DATA ADEQUACY WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Water Resources
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: James Ackerman
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Highlight any water conservation measures on the diagram and the amount that they reduce water demand; and			
Appendix B (g) (14) (C) (viii)	<p>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.</p> <p>In the event that a will-serve letter, permit, or contract cannot be provided, identify the most likely wastewater/storm water entity and discuss why the applicant was unable to secure the necessary assurances to serve the project's wastewater/storm water needs. Also, discuss the term of the wastewater service to the project, whether the wastewater entity has adequate permit capacity for the volume of wastewater from the project and has adequate permit levels for the chemical/physical characteristics of the project's wastewater and storm water for the life of the project, and any issues or conditions/restrictions the wastewater entity may impose on the project.</p>	N/A	N/A	N/A

DATA ADEQUACY WORKSHEET

Completeness: Complete _____ Incomplete **x**
 Technical Area: **Water Resources**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: James Ackerman
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (D)	Identify all project elements associated with stormwater drainage, including a description of the following:	--	--	--
Appendix B (g) (14) (D) (i)	Monthly and seasonal precipitation and stormwater runoff and drainage patterns for the proposed site and surrounding area that may be affected by the project’s construction and operation;	Subsection 4.15.1, pp. 4.15-6, 4.15-8; Appendix G	No	See DR WATER-1
Appendix B (g) (14) (D) (ii)	Drainage facilities and the design criteria used for the plant site and ancillary facilities, including but not limited to capacity of designed system, design storm, and estimated runoff;	Appendix F, Sheet C.400, Details RD-05, SS-03, SW-13 & TC4	No	See DR WATER-1
Appendix B (g) (14) (D) (iii)	All assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post-construction; and	Appendix G, Section 2, pp. 2-16 to 2-21	No	See DR WATER-2
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.	Subsection 4.15.2, pp. 4.15-12 to 4.15-15, 4.15-20 to 4.15-23, 4.15-25 to 4.15-27; Subsection 4.15.5, Table 4.15-2, pp. 4.15-31 to 4.15-34	Yes	
Appendix B (g) (14) (E)	An impacts analysis of the proposed project on water resources and a discussion of conformance with water-related LORS and policy. This discussion shall include:	Subsection 1.4.3, p. 1-9; Subsection 2.3.2, p. 2.3-19, Subsection 2.3.3, pp. 2.3-25 to 2.3-26, Subsection 2.3.4, p. 2.3-31, Subsection 4.15-1, pp. 4.15-1 to 4.15-5, Subsection 4.15-2, pp. 4.15-11 to 4.15-27, Subsection	Yes	

DATA ADEQUACY WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Water Resources
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: James Ackerman
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		4.15-3, pp. 4.15-27 to 4.15-29, Subsection 4.15-5, pp. 4.15-31 to 4.15-34, Subsection 4.15-6, p. 4.15-34; Appendices E.1 and E.2		
Appendix B (g) (14) (E) (i)	The effects of project demand on the water supply and other users of this source, including, but not limited to, water availability for other uses during construction or after the power plant begins operation, consistency of the water use with applicable RWQCB basin plans or other applicable resource management plans, and any changes in the physical or chemical conditions of existing water supplies as a result of water use by the power plant;	Subsection 4.15-1, pp. 4.15-1 to 4.15-5; Subsection 1.4.3, p. 1-9; Subsection 2.3.2, p. 2.3-19, Subsection 2.3.3, pp. 2.3-25 to 2.3-26, Subsection 2.3.4, p. 2.3-31	Yes	
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;	Subsection 4.15-1, pp. 4.15-3 to 4.15-5	No	See DR-WATER-4
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;	Subsection 4.15-2, pp. 4.15-11 to 4.15-27, Subsection 4.15-3, pp. 4.15-27 to 4.15-29	Yes	

DATA ADEQUACY WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Water Resources
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: James Ackerman
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (iv)	If not using a zero liquid discharge project design for cooling and process waters, include the effects of the proposed wastewater disposal method on receiving waters, the feasibility of using pre-treatment techniques to reduce impacts, and beneficial uses of the receiving waters. Include an explanation why the zero liquid discharge process is "environmentally undesirable," or "economically unsound;"	N/A	N/A	N/A
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	N/A	N/A
Appendix B (g) (14) (vi)	The effects of the project on the 100-year flood plain, flooding potential of adjacent lands or water bodies, or other water inundation zones; and	Subsection 4.15-1, pp. 4.15-8 to 4.15-11, Subsection 4.15-2, p. 4.15-27	Yes	
Appendix B (g) (14) (vii)	All assumptions, evidence, references, and calculations used in the analysis to assess these effects.	Subsection 4.15-1, pp. 4.15-1 to 4.15-11, Subsection 4.15-2, pp. 4.15-11 to 4.15-27, Subsection 4.15-3, pp. 4.15-27 to 4.15-29	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the	Subsection 4.15-5, pp. 4.15-31 to 4.15-34	Yes	

DATA ADEQUACY WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Water Resources
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: James Ackerman
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	Subsection 4.15-6, p. 4.15-34; Appendix E.1	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E.1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix E.2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Wildfire
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION 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.	Section 4.16.1 to 4.16.2, pp. 4.16-1 to 4.16-9	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	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;	Section 4.16.7, pp.4.16-19 to 4.16-20	Yes	
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 4.16.1, pp. 4.16-1 to 4.16-5; Section 4.16.2 to Section 4.16.3 pp. 4.16-7 to 4.16-16; Section 4.16.7 pp. 4.16-19 to 4.16-20	Yes	
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.	Section 4.16.1, p. 4.16-6, Figure 4.16-1	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete x Incomplete
 Technical Area: **Wildfire**
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
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.	Section 4.16.1, p. 4.16-6, Figure 4.16-1	Yes	
Appendix B (g) (19) (A)	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:	N/A	N/A	N/A
Appendix B (g) (19) (A)	Local emergency response or evacuation plans and a description of how the proposed project could influence their effectiveness.	Section 4.16.2, pp. 4.16-8 to 4.16-11, Section 4.17, p. 4.17-12; Appendix I.2	Yes	
Appendix B (g) (19) (A)	A discussion of how potential project pollutants could be contained onsite during a wildfire event.	Section 4.16.2, pp. 4.16-11 to 4.16-13	Yes	
Appendix B (g) (19) (A)	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.	Section 4.16.1, pp. 4.16-4 to 4.16-5, Section 4.16.2, pp. 4.16-11 to 4.16-14	Yes	
Appendix B (g) (19) (A)	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.	Section 4.16.1, pp. 4.16-3 to 4.16-4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete
 Technical Area: Worker Safety
 Project Manager: Lisa Worrall/Ann Crisp

Revision No. 0 Date: March 28, 2024
 Project: Perkins Renewable Energy Project Technical Staff: Alvin Greenberg
 Docket: 24-OPT-01 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 4.17.2, p. 4.17-2, Tables 4.17.1 and 4.17.2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	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.	Subsection 4.17.7, p. 4.17-26	Yes	
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.	Subsection 4.17.2, p. 4.17-5 to 4.17-16	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete x
 Technical Area: Worker Safety
 Project Manager: Lisa Worrall/Ann Crisp

Project: Perkins Renewable Energy Project
 Docket: 24-OPT-01

Revision No. 0 Date: March 28, 2024
 Technical Staff: Alvin Greenberg
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (11) (A)	A description of the safety training programs that will be required for construction and operation personnel.	Subsection 4.17.2, pp. 4.17-10 to 4.17-16, Table 4.17-4, p. 4.17-4	No	See DR WS-1
Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.	Subsection 4.17.2, pp. 4.17-19	No	See DR WS-3
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	Subsection 4.17.2, p. 4.17-11 to 4.17-16	No	See DR WS-1 to DR WS-5
	Construction Health and Safety Program:	Subsection 4.17.2, p. 4.17-11 to 4.17-12	No	See DR WS-1 to DR WS-5
	• Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);			
	• Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920);	Subsection 4.17.2, p. 4.17-12	No	See DR WS-3 and WS-5
	• Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522)	Subsection 4.17.2, p. 4.13-11	Yes	
	Operation Health and Safety Program:	Subsection 4.17.2, p. 4.17-13 to 4.17-16	No	See DR WS-1 and WS-2
	• Injury and Illness Prevention Program (8 Cal. Code Regs., §3203);			
	• Fire Prevention Plan (8 Cal. Code Regs., § 3221);	Subsection 4.17.2, p. 4.17-1	No	See DR WS-3 and WS-5
• Emergency Action Plan (8 Cal. Code Regs., § 3220);	Subsection 4.17.2, p. 4.17-16	Yes		
• Personal Protective Equipment Program (8 Cal. Code Regs., §§3401-3411).	Subsection 4.17.2 p. 4.17-15	Yes		

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **x**
 Technical Area: **Worker Safety**
 Project Manager: Lisa Worrall/Ann Crisp

Revision No. 0 Date: March 28, 2024
 Project: Perkins Renewable Energy Project Technical Staff: Alvin Greenberg
 Docket: 24-OPT-01 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 4.17-5, p. 4.17-20	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and 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 E2, pp. 1-4	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix E1, pp. 1-3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

Attachment B

Data Requests

Attachment B Data Requests

MANDATORY OPT-IN REQUIREMENTS

California Code of Regulations, title 20, section 1876 requires Opt-In applications to comply with title 20, section 1707. Section 1707 requires that every application be dated and signed by each applicant attesting under penalty of perjury to the truth and accuracy of the application.

DR MAND-1. Please provide a signed and dated attestation, executed under penalty of perjury, stating that the Perkins Renewable Energy Project Opt-In Application is truthful and accurate.

California Code of Regulations title 20, section 1877(f) requires Opt-In Applications identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code section 25545.9. Information in Appendix E.3, Imperial County Net Economic Benefit subsection (pp. 10 to 11) discusses gross positive economic benefits to Imperial County, but not the costs or expenditures, therefore an overall net positive economic benefit to Imperial County is not demonstrated. Information in Appendix R (filed with an Application for Confidential Designation), subsection 2.8, discusses Imperial County public expenditure impacts as a result of the project.

DR MAND-2. Please supplement the Imperial County Net Economic Benefit discussion in Appendix E.3 with information demonstrating whether the project would have an overall **net** positive benefit to Imperial County (i.e., the positive economic impacts less the negative economic impacts).

California Code of Regulations, title 20, section 1877(g) requires the application contain a plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreements with, or that benefit, a community organization or a coalition of one or more community organizations, consistent with Pub. Resources Code section 25545.10. Appendix S, Community Benefits Narrative, contains a plan to rely on three executed agreements, also included with Appendix S but under confidential cover. Those agreements contain a clause permitting the applicant to cancel the agreement at any time upon written notice to the recipient of the funds. For this reason, the agreements are not binding on the applicant nor enforceable by the recipient, and do not evidence a plan to enter into binding agreements.

DR MAND-3. Please provide a plan or strategy, including a timeline for execution, to obtain a legally binding and enforceable agreement(s) that benefits one or more of the listed types of community beneficiaries identified in Public Resources Code section 25545.10.

California Public Resources Code section 25545.13 requires the California Energy Commission (CEC) to deem an opt-in project an environmental leadership development project and confirm that all requirements of Chapter 6.5 of Division 13 are met. Section 21183(e) requires the applicant enter into a binding and legally enforceable agreement that all mitigation measures required to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency, or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, that those measures will be monitored and enforced by the lead agency for the life of the obligation. The application states the applicant agrees to this provision, but there is no separate binding and enforceable agreement submitted with the application. In order to certify the project as an environmental leadership development project, the commission must receive this agreement.

DR MAND-4. Submit a signed and enforceable agreement that complies with Public Resources Code section 21183(e).

AIR QUALITY

For the CEC's jurisdiction and in lieu authority set forth in Public Resources Code section 25545.1(b)(1), any state or local air quality permit that would have been issued from the Imperial County Air Pollution Control District (District or ICAPCD) will be incorporated into the CEC's certification. To facilitate the District's review of the project, the applicant can file with the District, the information required to obtain relevant permits. To ensure the District's requirements and mitigation are contained in the CEC's Environmental Impact Report (EIR) and certification, staff needs copies of all correspondence between the applicant and the District in a timely manner to stay up to date on any issues that arise prior to completion of the environmental document.

DR AQ-1. Please provide copies of all substantive correspondence between the applicant and the District regarding the project, including applications and emails, within one week of submittal or receipt. This request remains in effect until staff publishes the environmental document.

DR AQ-2. Please provide a completeness determination letter from the ICAPCD confirming that the application submitted to the District has been deemed complete.

Section 4.1, Air Quality, page 4.1-14 states that the project would include an emergency diesel generator. However, the application does not include the manufacturer's specification sheets for the emergency diesel generator.

DR AQ-3. Please provide the manufacturer's specification sheets for the emergency diesel generator, which would show emission levels and exhaust parameters of the emergency diesel generator.

Ozone and particulate matter of 10 micrometers or less in diameter (PM10) are

designated as nonattainment in Imperial Valley. The applicant provided data on the ambient concentrations of ozone, PM10, and particulate matter of 2.5 micrometers and smaller in diameter (PM2.5) measured at the El Centro 9th Street Station and Calexico Ethel Street Station for the years 2018 to 2022. However, staff requests the more detailed background ambient concentration analysis.

DR AQ-4. Please provide the ambient concentrations of all criteria pollutants relevant to the project, i.e., ozone, PM10, PM2.5, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), from the past three years, as recorded by the three Air Resources Board-certified monitoring stations nearest to the project site.

DR AQ-5. Please provide an analysis, such as a comparison of emission sources near the monitoring stations and near the project site, to determine if this ambient criteria pollutant data accurately represents conditions at the project site.

Appendix H.2 of the application only provides an overview of the meteorology in Imperial County, including average temperatures and annual precipitation. However, meteorological data for one year must be gathered from either the closest Federal Aviation Administration Class 1 station to the project, the project site itself, or from sources approved by the California Air Resources Board or the local air pollution control district. If the data is collected from the project site, the applicant must ensure it meets the standards set forth in the "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" document by the U.S. Environmental Protection Agency.

DR AQ-6. Please provide the meteorological data that includes 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.

The applicant utilizes California Emissions Estimator Model (CalEEMod) to calculate the air pollution emissions for both the construction and operation phases. However, the estimated emissions for the construction phase does not cover all the criteria air pollutants including NO_x, SO₂, CO, PM10, and PM2.5. Additionally, staff requires a dispersion modeling analysis that takes into account parameters such as source emissions, terrain impact, meteorological conditions, building downwash, to list a few. This analysis is crucial to ascertain whether the air concentrations of these criteria pollutants comply with state and federal ambient air quality standards (AAQS).

DR AQ-7. Please provide the complete CalEEMod results that cover all criteria pollutants including NO_x, SO₂, CO, PM10, and PM2.5 during the construction and operation phase.

DR AQ-8. Please provide an ambient air quality impacts analysis of all criteria pollutant concentrations including NO_x, SO₂, CO, PM10, and PM2.5 using a dispersion model such as AERMOD during construction and operation and compare

these concentrations with the thresholds for state and federal AAQS.

DR AQ-9. Please provide the location and specifications of the proposed backup generator, which shall be incorporated into the dispersion model as a point source.

DR AQ-10. Please provide justification regarding whether a cumulative air quality impacts modeling analysis is needed. If yes, please submit a modeling protocol for assessing the cumulative air quality impacts of the project during its standard operational phase 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.

Appendix E.2 lists the steps the applicant intends to follow to secure the necessary permits. However, further details regarding these permits are required.

DR AQ-11. Please provide a planned schedule of when these permit applications would be submitted and when these permits would be obtained.

BIOLOGICAL RESOURCES

DR BIO-1. Please provide the results of all biological resource surveys conducted on private and Bureau of Reclamation (BOR) land in Spring of 2024. Include any additional assumptions and methods used in arriving at results as well as details on any modifications made to the required survey methods or guidelines. Include any additional research and/or references used for the spring surveys. Update all pertinent sections of the application in underline and strike through.

DR BIO-2. Please include the references for any additional literature relied upon or referenced for the biological resource surveys conducted in 2024. Please submit a copy of the Bureau of Land Management (BLM) Plan of Development (POD) with appendices.

The narrative of Appendix J.2, Jurisdictional Waters Report, mentions California Code of Regulations, title 14, section 1.72, which was developed by the Fish and Game Commission for the purposes of sport fishing. This definition has a narrow focus on only certain types of streams (e.g., streams with aquatic life and riparian). Fish and Game Code, section 1602 falls outside the authority of the Fish and Game Commission, and the use of California Code of Regulations, title 14, section 1.72 in delineating streams for Fish and Game Code, section 1602 is inappropriate. Fish and Game Code, section 1602 and California Code of Regulations, title 14, section 720 clearly states that for the purposes of implementing these sections all streams are subject to Fish and Game Code, section 1600 et seq., thus without regard to stream type, size, duration of flow, or the flora or fauna present. Altered streams also are subject to Fish and Game Code, section, 1600 et seq.

A stream channel includes the area where water uniformly or habitually flows over a

given course, and where the width of the watercourse can reasonably be defined. Thus, a channel is not limited to a specific flow event – such as ordinary high water – nor by the path of surface water associated with a particular low flow as this path might vary seasonally. Rather, the channel is more appropriately based on the topography or elevations of land that confine the water to a particular course when the waters of a stream rise to their highest point.

As the project area has infrequent rainfall and wind is the dominant driver on the landscape (that will obscure subtle fluvial forms and signs), there can be uncertainty using point-in-time field indicators.

Features that were excluded from the Notification of Lake or Streambed Alteration Application (LSAA or notification), included as Attachment A of Appendix K (Streambed Alteration Agreement), appear to provide flow connectivity from stream features to the east (Figure 7 - JD Feature 12) to the larger avoided watercourse on the western project boundary. This area of connectivity is labeled as 'vegetated swale' in the jurisdictional delineation figures, Figures 6, 7, 10, and 11 included in the Jurisdictional Waters Report, Appendix J.2. These areas appear to be topographic lows that would convey flows towards the west, supported by the Hydrologic and Hydraulic 2D Analysis, and shall be included in a notification pursuant Fish and Game Code, section 1602. Additionally, the areas mapped as 'vegetated swale' and the 'alkali goldenbush desert scrub' adjacent to areas avoided by the project coincident with the National Hydrography Dataset ephemeral streams shown on Figure 2 of the Jurisdictional Waters Report, Appendix J.2 shall also be included in a notification pursuant Fish and Game Code, section 1602. For these reasons, the Jurisdictional Waters Report and LSAA are incomplete or contains incorrect information.

DR BIO-3. Staff needs additional information regarding the Jurisdictional Waters Report, Appendix J.2 as follows:

- a. Please revise the regulatory language to reflect the appropriate Fish and Game Code and remove reference to California Code of Regulations, Title 14, section 1.72.
- b. The features shown as 'bank to bank' in Figure 7 of the LSAA, Appendix K, are reasonable depictions of the small ephemeral channels on this landscape. However, the notification assumes these features stop in isolation. Please utilize the Hydrologic and Hydraulic 2D Analysis in Appendix G to review the depth and lateral extent of flows during large magnitude but infrequent storms (i.e., 50- and 100-year recurrence intervals) to inform the delineation of the project area, particularly regarding longitudinal connectivity and lateral extent. Also, please update the notification with this information for the surveyed areas of the site, particularly the area depicted in Figure 7, and apply this process to the unsurveyed areas of the project as well. Please consider the lateral extent and longitudinal connectivity, and the potential for multithread channels to exist on the landscape. These features likely connect to JD Feature 12 and the 'vegetated

swale’.

- c. Please update LSAA in Appendix K with the results from the surveys scheduled in Spring 2024 (See **DR-BIO-1**).
- d. Update any figures/mapping to include additional waters of the state found on private and/or Bureau of Reclamation (BOR) land. Please address temporary and/or permanent impacts to jurisdictional waters on private and/or BOR land, if applicable.
- e. Please update existing measures to prevent sediment, hazardous materials, or other materials from entering watercourses during and after construction.
- f. Please update any avoidance and/or minimization measures to protect fish, wildlife, and plant resources based on Spring 2024 survey results. In addition, update any new mitigation and/or compensatory mitigation measures, if needed to avoid impacts, based on results of spring surveys. Also refer to **DR BIO-28**.
- g. Please further evaluate the area depicted in Figure 7 of Attachment A in Appendix K for additional features overlooked during the initial jurisdictional delineation with consideration of the Hydrologic and Hydraulic 2D Analysis and subtle or obscured fluvial forms and signs.
- h. Please provide notification information on these additional areas referenced in **DR BIO-3g**. Also include photographic support looking downstream to depict the topography, depression, or potential overland sheet flow. Additional areas shall be evaluated for inclusion or exclusion per Fish and Game Code, section 1602.
- i. Please update the figures and Geographic Information System (GIS) shapefiles of Appendix J.3 to depict the updated areas subject to California Department of Fish and Wildlife (CDFW) jurisdiction and the mapped hydrology.
- j. Please update the project description of the LSAA, included in Attachment A of Appendix K, to include a section that focuses on the project components and project activities that would be performed in the areas subject to Fish and Game Code, section 1602. Please refer to the Project Description instructions in Section 10 of the Form DFW 2023, Notification of Lake or Streambed Alteration. At this time the project description describes the overall project but does not address the specific activities in relation to waters of the state. Please include impact information in the narrative to support the permanent and temporary impacts data included in Table 2 and Table 3, under the Section 11A, Project Impacts, in Attachment A.
- k. Under Item 12C of the LSAA form, “Attachment B” is referenced to contain project mitigation and/or compensation measures to protect fish, wildlife, and plant resources, however this attachment is missing from the LSAA. Please submit Attachment B.
- l. Please include the areas mapped as ‘vegetated swale’ and the ‘alkali goldenbush

desert scrub' adjacent to areas avoided by the project coincident with the National Hydrography Dataset ephemeral streams shown on Figure 2 of the Jurisdictional Waters Report, Appendix J.2 in the LSAA pursuant to Fish and Game Code, section 1602.

DR BIO-4. Please provide a figure and GIS shapefiles that show the proposed locations of the transmission line structures, including pull sites, within the transmission line corridor in relation to the All-American Canal and associated wetlands.

DR BIO-5. There are inconsistencies in the "Noteworthy Avian Observations" figure. Please revise the figure to define "other sign" in the legend of the "Noteworthy Avian Observations" figure included in Appendix J.3, Biological Resources Figures.

DR BIO-6. Staff needs additional information regarding biological resources:

- a. Please provide the California Natural Diversity Database (CNDDDB) occurrence list for the project quadrangles as referenced in the application as CDFW 2023c.
- b. Please provide a renewed CNDDDB occurrence list, if the original has expired.
- c. Please provide the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) Resource List generated for this project and referenced as USFWS 2023b.
- d. Please provide a habitat assessment, that includes historical occurrences, potential to occur, impact analysis and any avoidance, minimization, and/or mitigation measures that would be applicable for southwestern willow flycatcher (*Empidonax traillii extimus*) and monarch butterfly (*Danaus plexippus*).
- e. Please address ALL species that were included on the CNDDDB and IPaC species lists generated for this project. The response needs to include the potential for each species to occur within the project vicinity, historical records, survey results, impact analysis and any avoidance, minimization and/or mitigation measures, if applicable.
- f. Appendix J.1, Section 3.3.3 states that suitable habitat for special status bat species does not exist on site, however Section 4.1.8 states that suitable foraging habitat and roosting habitat for western yellow bat (*Lasiurus xanthinus*) is present within the project site. Please correct the discrepancy between these conclusions.
- g. Wildlife and plant surveys were performed during daylight hours and lacked use of a full spectrum bat detector. Please describe methods used to determine utilization of the area by bat species for foraging and/or roosting and document which dates these surveys occurred.

DR BIO-7. Please submit resumes that include relevant qualifications for all

biologists conducting biological resource surveys and aquatic resource delineations. Also, please submit copies of all field survey forms. This applies to all prior and pending biological resources surveys.

DR BIO-8. Please clarify reasoning for the inclusion of western bumble (*Bombus occidentalis*) bee in the application based on its range. See <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213186&inline>. Please update the listing status of western bumble bee and Crotch's bumble bee (*Bombus crotchii*) in Appendix A of the Biological Resources Technical Report.

DR-BIO-9. Please provide the mitigation measures that were to be included as "Attachment A, Mitigation Measures" as referenced in the Appendix M.3, Raven Management Plan. These mitigation measures were not included.

DR BIO-10. Please include the title, mailing address, and phone number for each person included on the contact list, included as Table 1 in Appendix E.1. Also, please identify the point of contact for coordination and verification of any proposed habitat mitigation measures.

DR BIO-11. In Appendix J.2, Jurisdictional Waters Report, the compensatory mitigation ratio for impacts to state jurisdictional waters (Waters of the State) is listed at 2:1 for both temporary and permanent impacts. Please explain why the proposed compensatory mitigation ratio for temporary is the same as permanent.

DR BIO-12. Appendix J.4 second figure "Noteworthy Reptile Observations" upper right legend shows box one covers the eastern portion of the transmission corridor. Please include a figure showing occurrences on the western side, if available.

DR BIO-13. Please provide a detailed map(s) at a scale of 1:350,000 for public viewing that show the proposed project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the CNDDDB, and the associated areas where biological surveys were conducted per the requirements of Appendix B (g) (13) (B) (i).

There are inconsistencies in the results of the literature review and survey results for western yellow bat presented in the application. Western yellow bat is listed as "present", and the applicant documented "five live individuals and nine active burrows observed on project site during surveys" in Table 1 in Appendix M.1, Bird and Bat Conservation Strategy (BBCS) Plan. However, Section 4.7 of the BBCS states "no western yellow bats or roosts were observed during 2023 wildlife surveys on the Project site". In addition, Table 4.2-4, included in Chapter 4.2 of the Opt-In Application, states, "Not Observed. Several CNDDDB records 10 miles from the Project Site" and Appendix A in the Biological Resources Technical Report (Appendix J.1) states, "Not observed. One record of western yellow bat 20 miles from the Project site". Appendix J.1, Section 3.3.3 states that special status bat species suitable habitat does not exist on site, however Section 4.1.8 states that suitable foraging habitat and roosting habitat for western

yellow bat are within the project site.

In addition to the data request below, please be advised that if the habitat assessment requested below indicates suitable bat habitat is present, CDFW recommends that a one-year study that captures seasonal variations (e.g. maternity, migration, overwintering) is conducted to establish baseline conditions for inclusion in the Final BBCS.

DR BIO-14. Please provide the following information regarding the western yellow bat and other bat species. Please ensure the determination of habitat presence and impacts to all bat species is clear and well supported:

- a. Clarify the presence of western yellow bat in the project area including status of records and observations for western yellow bat. Please correct the discrepancies in all sections of the application.
- b. Describe the field survey methodology used to assess presence/absence of western yellow bat and its adequacy to make a determination on impacts to the species and whether the impacts are significant.
- c. Please provide a habitat assessment conducted by a qualified bat biologist to identify bat species on site and provide an impact analysis for western yellow bat, Yuma myotis (*Myotis yumanensis*), and all other bat species that may potentially utilize the site. The habitat assessment must include an analysis of the potential habitat (diurnal, night roosts, hibernaculum and foraging) present on site, historical occurrences, and migratory range. Include a description of the methods used to analyze the presence or absence of bat species within the project area. As bats may utilize rocky outcrops, dense tree canopies, tree hollows, snags, bridges over creeks/water, water bodies, dry washes, microphyll woodland, and mines/caves/flumes, these habitat types will need to be specifically surveyed if present within the project site. Identify foraging areas (e.g., the All-American Canal, microphyll woodland) and specific flight routes to those foraging areas. Identify bats to the most specific taxonomic level possible.
- d. Please include the results of the habitat assessment in Section 4.2.2 and ensure the assessment includes consideration of loss of roosting sites and whether the project may impede native wildlife nursery (e.g., roosting) sites through loss of foraging habitat. Please also add the species composition to applicant's Draft BBCS.
- e. If suitable bat habitat is present, and the field survey methodology used did not include acoustic surveys conducted by a qualified bat biologist utilizing full-spectrum acoustic bat detectors, please include these studies as described. Please ensure the results of acoustic surveys are analyzed and interpreted by a qualified bat biologist proficient in interpreting acoustic calls to the species level, with resume provided in the application (see **DR BIO-7**). Please submit the results of 2024 Spring/Summer surveys in a timely manner once the season ends. To maintain record continuity, please continue to conduct surveys in the

subsequent seasons to capture a year's worth of data for reporting in the Final BBCS, which will be required prior to the start of construction. These surveys shall identify daily, seasonal, or migratory use patterns, when the migration occurs, what species use the route, and in what relative numbers. Acoustic surveys need to include a study design that deploys sufficient acoustic sampling equipment to provide adequate sampling of potentially suitable habitat, and deployed for sufficient duration, to capture seasonal shifts in site use.

- f. Please address potential impacts to bat species from artificial lighting, polarization of light, and any other potential adverse impacts to these species. In addition, discuss the potential "lake effect" of PV panels, which may act as an attractant to bats.
- g. Please provide appropriate avoidance, minimization and/or mitigation measures based on the bat species present.

Appendix M.1, Table 3 (Native Habitat Impact Acres) does not include acreage amounts.

DR BIO-15. Please provide the acreage amounts for permanent and temporary impacts for all habitat types.

Subsection 4.2.8 of the Biological Resources Technical Report provides a discussion of sand food (*Pholisma sonora*); however, the last sentence discusses the location of suitable habitat for Abram's spurge (*Astragalus magdalenae* var. *peirsonii*).

DR BIO-16. Please revise this section to discuss the location of suitable habitat for sand food instead of Abram's spurge.

There is erroneous information regarding desert kit fox (*Vulpes macrotis arsipus*) provided in Table 4.2-4 Special Status Wildlife Species with Potential to Occur in the Project Vicinity (Chapter 4.2 of the Opt-in Application). The table states the species is listed as threatened under the California Endangered Species Act and endangered under the Federal Endangered Species Act as identified in the "status" column of Table 4.2-4. Desert kit fox is not listed under state or federal endangered species acts but is a state protected, fur-bearing mammal (see Cal. Code Regs., tit. 14, § 460) as referenced in Appendix J.1, Biological Resources Technical Report, Section 4.1.15.

DR BIO-17. Please update Table 4.2-5 to include the correct status information for desert kit fox.

DR BIO-18. There is erroneous information regarding the status of the American peregrine falcon (*Falco peregrinus*) provided in the application. Please see Senate Bill 147 (Ashby, Chapter 59, Statutes of 2023) in which the species was removed from the state's list of fully protected species. Please update the document, including Table 4.2-4 (Section 4.2) and the BBCS Plan, to include the current state designation for the species.

DR BIO-19. Staff needs additional information on survey methods and impact analysis for Crotch's bumble bee:

- a. Describe the field survey methodology used to assess presence/absence of Crotch's bumble bee and its adequacy to make a determination that take would not occur during construction, operation and maintenance, and decommissioning activities, including during earth moving activities, vegetation removal and mowing, and invasive species management. Please describe the methodology as compared to the considerations provided within the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, for more information see <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>.
- b. The impact analysis mentions the potential of direct impact on Crotch's bumble bee nests. Surveys shall be conducted following the document provided above as impacts to an occupied nest could result in take. The narrative states there is potential for take, yet also states lack of habitat, which is contradictory. Please conduct the appropriate surveys so staff has adequate information to conduct the impact analysis.

The CDFW has been referred a petition to list western burrowing owl (*Athene cunicularia hypugaea*) as endangered or threatened under CESA that is currently under a 90-day evaluation. This petition was submitted by Center for Biological Diversity and several other groups on March 5, 2024. There is the potential that western burrowing owl may become a candidate under CESA in which no take may occur unless state take authorization is obtained for a project. The petition process timeline may be viewed here: <https://fgc.ca.gov/cesa>.

Regardless of the species' CESA status, permanent compensatory mitigation consistent with the recommendations in the Staff Report on Burrowing Owl Mitigation such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced to offset the impact would be appropriate mitigation, with consideration of creation of artificial burrows, as needed (for more information see: [BUOW MIT StaffReport2012.pdf](#)). Should the CESA listing occur, all "take" must be fully minimized and mitigated, so a mitigation measure would need to be proposed by the applicant for review and approval by staff and the other resource agencies (e.g., CDFW and USFWS). Appendix F of the Staff Report on Burrowing Owl Mitigation contains guidance on preparing a mitigation management plan and vegetation management goals for compensatory mitigation lands.

Subsection 3.3.2.1 of the Biological Resources Technical Report states the surveys for burrowing owl used methods previously approved on other projects. Survey guidance is provided on a project-by-project basis. The application states that only one burrowing owl survey was performed, concurrently with other species surveys, and burrow inspections were performed on the subsequent three surveys.

Appendix J.1, Biological Resources Technical Report and Section 4.2.2 under Impact BIO-1, both state that five live individuals, nine active burrows, and two carcasses were observed on Project Application Area during surveys. However, the Noteworthy Avian Observation figure included in Appendix J.3 identifies sixteen observations of live individual burrowing owl.

DR BIO-20. Please provide the following information:

- a. Due to presence of live burrowing owls on site, it is recommended to update the application to address the mitigation and management goals as identified in Appendix F of the Staff Report on Burrowing Owl Mitigation, and as required in California Code of Regulations, title 14, section 783.2(a)(1)-(a)(10) should the species become a candidate in the course of this process and take coverage would be requested.
- b. It is recommended that Subsection 4.2.2 Impact BIO-1 be revised to address that take must be fully minimized and mitigated. Include petition to list language and specific details on what needs to happen if the species becomes a candidate under CESA. Take is prohibited for candidate species unless authorized by state law through an Incidental Take Permit (ITP), and any impact would need to be fully minimized and mitigated. The CEC's certificate would be in lieu of an ITP; however, CEC must consult with CDFW to ensure necessary information is submitted during the CEC certification process to grant any authorizations under the Fish and Game Code (e.g., authorized take of a listed species) in lieu of CDFW.
- c. In addition to the information needed for an ITP (if needed), update the impact analysis in the application to reflect the intent to obtain an ITP and include proposed minimization and mitigation measures that would bring the project's impact to burrowing owls to less than significant with mitigation.
- d. Please update the burrowing owl surveys following the recommended methods described in the California Department of Fish and Wildlife's Staff Report on Burrowing Owl (March 7, 2012), *Surveys, Survey Reports, Impact Assessment sections and Appendix D Breeding and Non-breeding Season Surveys and Reports*. Please also include an analysis regarding the suitability of non-breeding surveys based on the site conditions, species sign, local climate, and nearby occupancy of similar sites.
- e. Please revise the Noteworthy Avian Observation figure included in Appendix J.3 to differentiate between live individuals, active burrows, and carcasses on the figure.
- f. The Biological Resources Technical Report (Appendix J.1) and Section 4.2.2 under Impact BIO-1, both state that five live individuals, nine active burrows, and two carcasses were observed on Project Application Area during surveys. However, the Noteworthy Avian Observation figure included in Appendix J.3 identifies sixteen observations of live individual burrowing owls. Please clarify.

DR BIO-21. The Desert Renewable Energy Conservation Plan (DRECP) Conservation and Management Actions (CMA) LUPA-BIO-COMP-2, listed in Appendix D.2, refers to compensation and a “fee re-assessed every 5 years to fund compensatory mitigation”. Staff is not aware of a current funding program that allows for this, please provide confirmation that this fund exists and a reference to additional information regarding the fund.

DR BIO-22. In Appendix D.2, the last bullet of DRECP CMA LUPA-BIO-6 states compensatory mitigation would be implemented; however, this project site is outside desert tortoise range and compensatory mitigation is only required when in desert tortoise range. Please clarify how this measure applies to the project. Please confirm that no desert tortoise or desert tortoise critical habitat is present within the project vicinity.

DR BIO-23. Section 4.2.2 of the application lacks the description of the incremental change to baseline to biological resources.

- a. Use the survey results to help inform the baseline conditions and any mitigation measures to offset significant impacts.
- b. Additionally, include the acreage of occupancy (supported visually with figures) and impact for each resource in the impact analysis narrative and include the acreage of habitat compensation being proposed.
- c. The application proposes mitigation ratios but does not define the area of impact from which the mitigation acreage will be calculated. If already addressed in Appendix J.5, please include the information in the analysis.
- d. The Staff Report on Burrowing Owl Mitigation (CDFG, 2012) provides guidance on the evaluation process to determine a project’s impact on burrowing owls. Please update the impact analysis in Section 4.2.2 to include the impact assessment evaluating the potential loss of nesting burrows, satellite burrows, foraging habitat, dispersal and migration habitat, wintering habitat, and habitat linkages, including habitat supporting prey and host burrowers and other essential habitat attributes. The impact assessment determines if impacts to the species will result in significant impacts locally, regionally and range-wide per CEQA Guidelines §15382 and Appendix G.

The application relies on complying with federal DRECP CMAs for mitigation but without the incremental change to baseline adequately described, there are not enough details to evaluate impacts and the adequacy of the proposed CMAs in reducing impacts to less than significant for CEQA. Many of the CMAs rely on BLM decisions, input, and/or approvals which is not appropriate for CEQA (e.g., LUPA-BIO-1). The avoidance, minimization, and mitigation measures being proposed need to be clearly defined in the application.

DR BIO- 24. Please list the parts of the CMAs that are being proposed to

specifically address the impact to biological resources and provide them as applicant proposed measures.

The application states habitat compensation for flat-tailed horned lizard would be provided in compliance with the Flat-Tailed Horned Lizard Rangeland Management Strategy (RMS). The RMS states compensation outside a management area but within occupied habitat will be 1:1. Neither text nor figures in the analysis of Section 4.2.2 indicate what is considered occupied habitat for the purposes of impact analysis and mitigation calculation. This information as described in Appendix J.5 needs to be included in this section to support the impact analysis. Additionally, 100 flat-tailed horned lizards were found during surveys on a portion of the project site. This is a high number of individuals for an area outside a management area. Available lands for acquisition that are occupied by flat-tailed horned lizard at the acreage currently proposed to date (minimum 4,760 acres at a 1:1 ratio) may be difficult to secure.

DR BIO-25. Please provide the following information:

- a. Please describe the reasoning a proposed 1:1 mitigation ratio is considered full mitigation for impacts to flat-tailed horned lizard given the high occupancy within the project site.
- b. Please revise Subsection 4.2.2 to include the information provided in Appendix J.5 to support the impact analysis, as described above.
- c. Please provide an analysis of the proposed mitigation lands suitability for offsetting project impacts. The analysis shall compare the species' occupancy and densities of the impact and mitigation sites. The analysis shall support a conclusion that the proposed mitigation is biologically equivalent or superior to the area of impact.
- d. Please state how the compensatory mitigation currently underway with mitigation partner, Wildlands, is adequate for the impact to the high-quality habitat for the species.
- e. The Wildlands letter in Appendix J.6 does not provide any specific details – please provide specific details including the land selection process, performance requirements, schedule, and outline of the plan.
- f. In addition, CDFW recommends extending the mitigation security timeframe in DRECP CMA LUPA-COMP-1 from 12 months to 18 months in anticipation of any unforeseen issues that might arise obtaining appropriate lands for mitigation with Wildlands. Please extend the mitigation security timeframe in accordance with the CDFW recommendation.

DR BIO-26. Please provide copies of all substantive correspondence between the applicant and the resource agencies regarding the project, including applications and emails, within one week of submittal or receipt.

Please provide a plan for resource/regulatory application submittals in Appendix E.2 as referenced in Section 4.15. Has BLM or BOR determined whether consultation in accordance with Section 7 of the ESA is required with the U.S. Fish and Wildlife Service? Please include any Section 7 determinations for federally listed species impacted by this project and include any records of consultation to date or that are planned with resource agencies.

These requests remain in effect until staff publishes the environmental document.

DR BIO-27. Please provide the following:

- a. Please provide revised figures depicting any state and federal jurisdictional waters or wetlands delineated during biological resource surveys planned for spring 2024 on private and Bureau of Reclamation land.
- b. There are inconsistencies in the data, tables and figures provided in the LSAA and the Appendix J.5. Temporary and Permanent impacts to Waters of the State are not consistent between Figures and Tables. Please correct the following inconsistencies:
 - i. LSAA Supplemental Pages, page 7, Table 2 numbers 1, 2, 3, 12 and 13 do not match Figure 7 acreage numbers.
 - ii. Appendix J.5, Tables 1 and 2 both show 1.7 acres of impact to waters of the state and are not broken down between temporary and permanent – the total acreage amount does not match the LSAA application. Please explain in text why these numbers are different or update, as needed. Please update and correct these tables and figures, as needed.
 - iii. There are inconsistencies in the data, tables and figures provided in the LSAA and the Waste Discharge Requirements (WDR) Supplemental Pages.

DR BIO-28. Please provide the following information:

- a. LSAA Supplemental Pages, Figures 7 does not show temporary impacts for numbers 16 and 17.
- b. LSAA Application #11B Vegetation Type has creosote bush scrub listed with the temporary and permanent waters of the state linear feet/total area amounts.
- c. WDR Supplemental Pages, Table 3 for permanent impacts to numbers 1 through 3 do not match Figure 7.
- d. WDR Supplemental Pages, Figures 7 does not show temporary impacts for numbers 16 and 17.
- e. WDR Supplemental Pages, Table 3 for permanent impacts to numbers 1 through 3 do not match Figure 7.

- f. WDR Supplemental Pages, Figures 7 does not show temporary impacts for numbers 16 and 17. Please explain in text why these numbers are different or update, as needed. Please update and correct these figures, as needed. Please revise to clarify the areas of temporary impacts, as well as update the notification to include all vegetation types and impacts associated with the updated jurisdictional delineation per **DR BIO-3**. Please revise all tables and figures to include the correct information.

DR BIO-29. Please add the use of helicopters and drones to the list of equipment and machinery in the LSAA and WDR applications.

DR BIO-30. The Biological Resources Technical Report, Figure 5, displays sand and dune systems within the project area. Please provide a sand transport study to analyze potential impacts to sand transport corridors/dunes in the project vicinity.

DR BIO-31. Please include the results of pre-construction surveys for fall blooming plant species with the potential to occur in the project area and include any applicable avoidance, minimization and/or mitigation measures.

DR BIO-32. Please provide the tables referenced in Appendix D.2 shown in red text. For example, DFA-BIO-IFS-1, Table 22 is shown in red in the statement "Implement the following setbacks shown below in Table 22 as applicable in the DFAs".

CULTURAL AND TRIBAL CULTURAL RESOURCES

DR CUL/TRI-1. The application does not discuss the potential impacts on cultural and tribal cultural resources and mitigation measures. Please provide this information.

DR CUL/TRI-2. Please update or provide the following bibliographic references and citations as indicated:

- a. Two citations and references in Section 4.3 need correction or reconciliation. Page 4.3-13 of the application cites Cocopah Indian Tribe (2020), but page 4.3-49 only includes a bibliographic entry for Cocopah Indian Tribe (2021). Which is the correct year?
- b. In addition, the bibliographic entry for Alvarez de Williams on page 4.3-45 is incorrect: it is given as 1978 but the year of publication should be 1983. In addition, the bibliographic entry refers to the California volume of the Handbook of North American Indians instead of the appropriate Southwest volume. Please correct this.
- c. Provide a bibliographic entry in References for Vyhmeister et al. (2024), which the application cites on page 4.3-2.

DR CUL/TRI-3. Section 4.3, Cultural Resources, Table 4.3-1 provides shorthand

references (authorship, year of publication, and study number) to previous cultural resource studies in the applicant's records search area. The reference list in Section 4.3 does not include bibliographic information for these studies. These information gaps hinder other parties' and the public's ability to understand what kinds of cultural resources assessments have been conducted in the records search area. Please provide bibliographic entries for the previous studies that Table 4.3-1 identifies.

DR CUL/TRI-4. Provide one missing page in P-13-007130: Page 3 of Archeological Site Record YMP-66, PDF page 108, included in Appendix N.1, Cultural Record Search (confidential).

DR CUL/TRI-5. On page 39 of the PDF file the P-13-011261 site record form is in an editable format (see 20240220T152927_CONFIDENTIAL Cultural Resource DPR Forms Part 3), included in Appendix N.1. Please confirm that the information provided on this page is identical to the information contained on it at the time of receipt from the South Coastal Information Center and no changes were made to the form.

DR CUL/TRI-6. Identify the individuals responsible for the records searches and whether they meet the Secretary of the Interior's standards for cultural resource professionals.

DR CUL/TRI-7. Provide a copy of the United States Geologic Survey (USGS) 7.5-minute quadrangle map(s) of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number.

DR CUL/TRI-8. Provide pages 2 and 3 for resource IMP-6064 in the report Gallegos, Dennis, and Andrew Pignolo, 1989, IM-00419 (page 33 in 20240220T161713_Confidential Cultural RS Reports Part 34), included in Appendix N.1.

DR CUL/TRI-9. Clarify in Section 4.3, Cultural Resources, Table 4.3-1, that the noted report author for IM-00538, included in Appendix N.1, is Wirth Associates, Inc., instead of County of Imperial, as Wirth claims authorship on the report's title page.

DR CUL/TRI-10. Provide pages 3 to 5 for resource H0903D-1 at the end of report Schaefer, Jerry, 1998, IM-00628 (20240220T163105_Confidential Cultural RS Reports Part 44), included in Appendix N.1.

DR CUL/TRI-11. Provide Chapter 6 and Appendices for Bureau of Land Management, 1994, IM-00674 (20240220T164653_Confidential Cultural RS Reports parts 47-48), included in Appendix N.1.

DR CUL/TRI-12. Provide the full folded out Location maps in Appendix 1 of Caltrans, 2002, IM-00944 (20240220T164812_Confidential Cultural RS Reports Part 53, PDF pp. 144–150), included in Appendix N.1.

DR CUL/TRI-13. Provide Appendices A and B of Schaefer, Jerry, and Mark Giambastiani, 2004, IM-00974 (20240220T164812_Confidential Cultural RS Reports Part 53), included in Appendix N.1.

DR CUL/TRI-14. The following previous cultural resource studies are cited in Section 4.3, Cultural Resources, Table 4.3-1, but copies of them are not included in the confidential cultural resources filings provided with the application. Please provide copies of these studies or explain why they do not need to be part of the application:

- a. Walker, Carol, Charles Bull, and Jay Von Werlhof, 1981, IM-00233
- b. Bureau of Land Management, 1981, IM-00235
- c. Schaefer, Jerry, and Collin O'Neill, 1998, IM-00525
- d. York, Andrew, Rebecca McCorkle Apple, Alex Kirkish, and Jackson Underwood, 2000, IM-00703
- e. Schaefer, Jerry, and Sherri Andrews, 2005, IM-01377
- f. Rayle, Christopher E., and Steve Swanson, 2017, IM-01678
- g. Bandy, Matthew, and Jim Railey, 2013, n/a

DR CUL/TRI-15. The applicant has not completed archaeological or historic architectural surveys of the project area. No cultural and tribal cultural resources technical report is contained in Appendix N.2 to the application. Please provide this report.

DR CUL/TRI-16. Provide a copy of the applicant's request to the Native American Heritage Commission (NAHC) and any copies of correspondence received from the NAHC, including the list of Native Americans contacts provided by the NAHC.

DR CUL/TRI-17. Include a copy of all correspondence the applicant sent to Native American individuals and groups listed by the NAHC and copies of all responses.

DR CUL/TRI-18. Use the results of cultural resource surveys to describe mitigation measures for impacts on known cultural and tribal cultural resources.

DR CUL/TRI-19. Please provide phone numbers and titles for the agency contacts in Appendix E.1 of the application, per Appendix B (i) (2) of the CEC's Siting Regulations.

DR CUL/TRI-20. Appendix F, Site Plan does not describe required permits outside the authority of the CEC, nor the schedule for obtaining the permits. Please provide

the permit table, per Appendix B (i) (3) of the CEC's Siting Regulations.

GREENHOUSE GAS EMISSIONS (CLIMATE CHANGE)

According to Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) a project can not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gas (GHGs). Staff needs more details on how the project would reduce GHG emissions, especially as it relates to the diesel-fueled emergency backup generator (backup generator) proposed as part of the project.

DR GHG-1. Explain how the proposed installation of a backup generator at the project site is consistent with the State of California's goal of achieving carbon neutrality no later than 2045.

DR GHG-2. What other technologies or fuel alternatives to diesel for the backup generator have you explored and why were they not pursued?

DR GHG-3. Has the project applicant explored the procurement of renewable diesel and/or carbon offsets as a means of demonstrating consistency with the State of California's goal of carbon neutrality? If not, why not?

In Section 4.1 Air Quality page 4.1-24 o states that the proposed circuit breakers and gas-insulated switchgear would contain sulfur hexafluoride (SF₆). However, according to the Amendments to the Regulation for Reducing Sulfur Hexafluoride¹ Emissions from Gas Insulated Switchgear^(OBJ), which became effective on January 1, 2022, starting on the applicable phase-out dates, no person may acquire SF₆ gas-insulated equipment (GIE) for use in California unless one of following provisions apply:

1. An SF₆ phase-out exemption was approved by the Executive Officer of the California Air Resources Board (CARB), or SF₆ GIE were acquired in response to a failure, pursuant to section 95357.
2. The SF₆ GIE device was present in California and reported to CARB pursuant to section 95355(a) for a data year prior to the applicable phase-out date listed in Table 1 or Table 2.
3. The SF₆ GIE device was purchased by the GIE owner prior to the applicable phase-out date listed in Table 1 or Table 2 for the relevant GIE characteristics, and enters California no later than 24 months after the purchase date.
4. The SF₆ GIE manufacturer replaces a defective SF₆ GIE device under the terms of the manufacturer's warranty.

Staff needs to confirm which of the four provisions the applicant would rely upon to comply with the current SF₆ phase-out regulation and what the applicable phase-out

¹ Available at: <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2020/sf6/fro.pdf>.

date is based on the proposed GIE characteristics.

DR GHG-4. Please confirm which of the four provisions the applicant would rely upon to comply with the current SF₆ phase-out regulation. If the project would not qualify for the exemption, please propose an alternative to SF₆.

DR GHG-5. If the applicant is going to use option 3 of the provisions shown above, please provide the voltage capacity and short-circuit current rating of the proposed circuit breakers and gas-insulated switchgear and applicable phase-out date. Please confirm whether the proposed circuit breakers and gas-insulated switchgear would be purchased prior to the applicable phase-out date and enter California no later than 24 months after the purchase date.

Staff needs to better understand the direct and indirect GHG emissions associated with the battery energy storage system (BESS). If grid power is used to charge the BESS, staff needs to know the indirect GHG emissions associated with the loss in round-trip efficiency for charging/discharging and GHG emission intensity from the electrical grid during charging. Staff also needs to better understand the GHG emissions associated with BESS cooling.

DR GHG-6. Please provide the loss in round-trip efficiency for the charging/discharging cycle, and the GHG emission intensity factor during charging.

DR GHG-7. Please clarify whether GHG emissions will be associated with the BESS cooling. If emissions are expected, please provide the estimated amounts of these GHG emissions.

HAZARDOUS MATERIALS HANDLING

Section 4.5, Tables 4.5-1, 4.5-2, and 4.5-3 provide essential information on the types, quantities, locations, and toxicity of hazardous materials that would be used during the construction and operation of the proposed project. However, information is missing and there are several discrepancies between these table and other information presented in the application that need clarification.

DR HAZ-1. For Table 4.5-1, please provide the quantity of lithium that would be present onsite for the BESS based on the Project Description (Section 2.3, p. 2.3-15), which includes several different lithium battery chemistries.

DR HAZ-2. Please update Table 4.5-3 to include the toxicity, reactivity and flammability for the lithium-ion BESS.

DR HAZ-3. Table 4.5-1 lists lead acid batteries as one of the possible energy storage options for the BESS. Also, several other battery types were mentioned in Hazardous Materials, Wildfire, and Worker Safety sections, specifically sodium sulfur, and sodium or nickel hydride. Please clarify if lead acid batteries, sodium sulfur

batteries or sodium or nickel hydride batteries would be used for the BESS and update the Project Description accordingly along with Tables 4.5-1, 4.5-2, and 4.5-3 (Section 2.3, p. 2.3-15).

DR HAZ-4. Please include hazardous materials and quantities in Tables 4.5-1, 4-5.2 and 4.5-3, as appropriate, that would be required for the operation of the 45-kW diesel emergency generator that is assumed to be Tier IV (with selective catalytic reduction (SCR) controls).

DR HAZ-5. As required by Appendix B (j) (2), please provide the name, title, phone number, address (required), and email address (if known), of the Certified Unified Program Agency (CUPA) official who was contacted and provide the name of the CUPA official who will serve as a contact person for CEC staff.

LAND USE

The California Code of Regulations (CCR), Title 20, Article 6, Appendix B, Information Requirements for an Application, requires the 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 (Appendix B (g) (3) (A) (i)).

DR LAND-1. Please discuss whether and if so, how site construction and operation could be affected by the site's proximity to the U.S.-Mexico border, which is less than 2 miles from the site, or could be affected by border-patrol activities that may occur in proximity to the site.

Appendix B requires 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 (Appendix B (g) (3) (A) (ii)). Section 4.02, Cumulative Impacts, identifies past, present or probable future infrastructure development projects within a 6-mile radius of the proposed project; however, the discussion does not address the general plan or zoning changes associated with these projects, and it does not discuss the general plan or zoning changes associated with non-infrastructure projects.

DR LAND-2. Please identify recent or proposed zoning or general plan changes that may have occurred that were not associated with infrastructure projects.

Appendix B requires the 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) ((Appendix B (g) (3) (A) (iii)). Section 4.02, Cumulative impacts, identifies past, present or probable future infrastructure development projects within a 6-mile radius of the proposed project. Only discretionary reviews associated with infrastructure or renewable energy projects are identified.

DR LAND-3. Please identify projects with discretionary reviews within the past 18 months that were not specifically associated with infrastructure projects.

Appendix B requires 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 and shall. Identify the need, if any, for land use decisions by another public agency or as part of the CEC's Decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations (Appendix B, (g) (3) (B)). It also requires a description of the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and temporary laydown or staging area, will be located on a single legal parcel (Appendix (g) (3) (C)).

Subsection 4.6.1 of the application identifies that the proposed project will include the use of privately owned parcels. While the proposed project conforms to the land use and zoning for these parcels, the application does not identify how the project proponent will obtain authorization to use the private land by the landowners (purchase, lease, etc.) In addition, Impact LU-2, page 4.6-15 states, "It may be desirable to merge the 6 private parcels that would be part of the project. Imperial County allows lot mergers under Title 9 of the Land Use Code, Division 8 – Subdivisions, Chapter 8-Lot Mergers Initiated by Property Owner.

DR LAND-4. Please provide more details on the roles of those involved including private landowners, how the project proponent will obtain authorization for the use of private land, and how the parcels would be merged as part of the project.

Appendix B requires tables or matrices 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 (Appendix B (i) (1) (A)). Although Subsection 4.6.4 provides a discussion of applicable laws and regulations, it does not explicitly reference places in the application where conformance is discussed.

DR LAND-5. Please provide explicit references to discussions within the application detailing conformance with applicable laws, regulations, ordinances, standards, adopted local, regional, state and federal land use plans, leases, and permits for the proposed project.

Appendix B requires the Land Use discussion to include 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 (Appendix B (i) (3)).

DR LAND-6. Please provide a table to include a schedule for obtaining permits outside the authority of the commission, and steps to obtain such permits. Create a table either in Section 4.6.5, or in Appendix E and cross reference the table in Section 4.6.5 or provide a reference if this data is provided elsewhere in the application.

The U.S. Department of Defense (DOD) has established a Military Aviation and Installation Assurance Siting Clearinghouse (Clearinghouse) to protect the Department's mission capabilities from incompatible energy development. DOD conducts formal and informal reviews of proposed projects. The DOD conducts both formal and informal project reviews and encourages developers to request an informal review early in the process. The goal of the informal review process is to identify areas of potential impacts and refer proponents to the appropriate DOD stakeholders for further discussion before the project is submitted to the Federal Aviation Administration's (FAA's Obstruction Evaluation/Airport Airspace Analysis (OEAAA) process. For more information see: <https://www.dodclearinghouse.osd.mil/Project-Review/https://www.dodclearinghouse.osd.mil/Project-Review/>.

The proposed project site is located within 1.2 miles of the U.S.-Mexico border and in an area where DOD missions may occur. Additionally, according to the California Military Energy Opportunity Compatibility Assessment Mapping Project (CaMEO CAMP) managed by the California Governor's Office of Planning and Research (OPR), the project site is below a United States Navy Military Training Route. For more information on CaMEO CAMP see: <https://opr.ca.gov/planning/land-use/military-affairs/>.

DR LAND-7. Please undertake and document an informal DOD Clearinghouse process prior to submission of FAA Airspace Analysis. The *DOD Siting Clearinghouse – Informal Review Request Form* is available at: https://www.dodclearinghouse.osd.mil/Portals/134/DOD_Siting_Clearinghouse_Informal_Request_Form_2023.pdf.

NOISE

Ambient noise monitoring surveys were conducted at various locations in and around the project site. In Section 4.7, Noise, Table 4.7-2, includes the summary of the noise survey at eight locations. Each monitoring survey conducted lasted only 30 seconds. A minimum of 15-minute noise monitoring survey should have been conducted to establish a more accurate existing ambient noise setting at the only human receptor location in the project area which includes the Bureau of Land Management (BLM) Long Term Visitor Area.

DR NOISE-1. At noise monitoring locations LT-6 and LT-7, provide, at a minimum, 15-minute ambient noise measurements (L_{eq}) during the morning, evening, and late-

night hours.

The project's aggregate operational noise level was not provided in the Opt-In Application.

DR NOISE-2. Please provide the project's aggregate operational noise level (L_{eq}) at LT-6 and LT-7 in the BLM Long Term Visitation Area.

PROJECT DESCRIPTION

Section 2, Project Description describes the 1,150-megawatt (MW) solar photovoltaic facility and up to 1,150 MW, up to 4-hour BESS facility, but it is unclear how and when the BESS facility would interact with each other and the electric grid, interconnecting with the existing San Diego Gas & Electric Company's 500 kV Southwest Power Link Transmission Line.

DR PD-1. Please provide a description of how the solar facility and BESS facility would interact with each other. For example, would the solar facility primarily provide power to the electrical grid and when would the BESS be charged and discharged? Section 4.1, Air Quality, page 4.1-14 states that the project would include an emergency diesel generator. However, the application does not clarify whether there would be a selective catalytic reduction (SCR) system with ammonia to control the nitrogen oxides (NO_x) emissions of the emergency diesel generator.

DR PD-2. Please clarify whether an SCR system would be used to decrease the NO_x emissions of the emergency diesel generator. If yes, please provide the project's estimated ammonia emissions. Please also provide the project's estimated nitrous oxide (N₂O) emissions based on scientific literature review or source test results.

DR PD-3. Please describe the handling of ammonia on site, specifically would the ammonia be stored on site and if so, please describe the storage container and the proposed location within the project. If the ammonia would be trucked into the project, please provide the number of truck trips and frequency of such deliveries.

Appendix A includes figures that show the project site but does not include adequate information regarding the county, county-international border, township, range, and sections.

DR PD-4. Please identify and label the county on each map (Figures 6 to 11), please identify and label the county-international border on applicable maps; and please identify and label the township, range and section(s) in each figure title (Figures 7 to 11).

Although Figures 2.3.1, 2.3.2, and 2.3.8 in Section 2, Project Description, illustrate the location of some transmission lines, they do not illustrate the existing overhead gen-tie and transmission lines in the project vicinity. While the location of proposed poles may

not be available, the location of existing transmission lines should be identified, and existing locations may be required to provide a robust discussion of cumulative effects and other subsequent analyses conducted by CEC.

DR PD-5. Please identify existing transmission and gen-tie lines on project figures presented in Subsection 2.3 and Appendix F, and please provide Geographic Information System (GIS) shape files to CEC to identify the locations of existing gen-tie lines/overhead transmission lines in the project vicinity so that they are available for analysis.

PUBLIC HEALTH

Section 4.9, Public Health, page 4.9-1 states that a Health Risk Assessment for an analysis associated with all toxic air contaminants (TACs) was not conducted for this project as no sensitive receptors are within 500 feet of the project site and no permanent sensitive receptors are within 1,000 feet of the project site. However, the application does not include a map showing the locations of the sensitive receptors or offsite workers within six-mile radius of the project. In addition, California Code of Regulations, title 20, Appendix B (g) (9) (A) requires 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 sections 44360-44366) or its successor and Approved Risk Assessment Health Values. These values shall include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005). Staff needs the results from a Health Risk Assessment to complete the analysis of the project impacts to sensitive receptors and offsite workers.

DR PH-1. Please provide a map showing sensitive receptors and offsite workers within six-mile radius of the project boundary.

DR PH-2. Please provide a Health Risk Assessment of the project during construction and operation to demonstrate that the project impacts to sensitive receptors and worker receptors would be less than significant. The Health Risk Assessment should show risks of cancer, non-cancer chronic exposure, and non-cancer acute exposure.

DR PH-3. Please provide a listing of the input data and output results, in both electronic and print formats, used to prepare the HARP health risk assessment.

SOCIOECONOMICS

DR SOCIO-1. The California Code of Regulations (CCR), Title 20, Article 6, Appendix B, Information Requirements for an Application, identifies the need to identify the applicable local agencies with taxing powers and their most recent and projected revenues (Appendix B (g) (7) (A) (i)). Please provide data to address the

most recent and projected revenues and whether the proposed project would have an effect on revenues including direct and indirect effects.

DR SOCIO-2. Appendix B requires the identification of social characteristics, including population and demographic and community trends (Appendix B (g) (7) (A) (ii)). Detailed data is provided showing historical data. Using this data, please provide a brief discussion or conclusions pertaining to anticipated changes in social characteristics, including population, demographic and community trends during the timeframe associated with construction and operation of the proposed project including any direct or indirect effects.

DR SOCIO-3. Appendix B requires existing and projected unemployment rates (Appendix B (g) (7) (A) (iii)). Using the data provided on historic unemployment rates, please provide a brief discussion and/or conclusions pertaining to anticipated changes in unemployment rates/trends during timeframe associated with the construction and operation of the proposed project including any direct or indirect effects.

DR SOCIO-4. Appendix B requires an estimate of applicable school impact fees (Appendix B (g) (7) (B) (vi)). Please provide the current year school impact fees for the school districts the project is proposed within. Please describe and provide a total square footage of the covered and enclosed area assessed for school impact fees.

DR SOCIO-5. Appendix B requires the following data and analysis: an estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees; an estimate of the expenditures for locally purchased materials for the construction and operation phases of the project; an estimate of the capital cost (plant and equipment) of the project; an estimate of sales taxes generated during construction and separately during an operational year of the project; an estimate of property taxes generated during an operational year of the project; and the expected direct, indirect, and induced income and employment effects due to construction and operation of the project (Appendix B (g) (7) (B) (vii to xii)). This data is presented in a data section for which an application for confidentiality is pending, but the section was reviewed by staff for completeness. In the event that CEC allows the applicant to exclude this data from public disclosure, Section 4.10, Socioeconomics must be revised to provide a non-confidential qualitative analysis that describes the conditions and results/impacts of the requested analyses. Should the request to maintain confidential data be refused, Section 4.10 must be updated to include the redacted data.

DR SOCIO-6. Appendix B identifies the need for an estimate of property taxes generated during an operational year of the project (Appendix B, (g) (7) (B) (xi)). Although property tax data is presented in Table 4.10-35 the section does not

provide an estimate of property taxes during an operational year of the project. Please provide an estimate of property taxes generated during an operational year of the proposed project.

DR SOCIO-7. Appendix B requires 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 (Appendix B (i) (1) (A)). The provided tables do not reference pages in the application wherein conformance with each law or standard is discussed. Please provide data or cross-references.

TRAFFIC AND TRANSPORTATION

DR TRANS-1. Please explain how the 50 percent vehicle trip reduction during construction was calculated and how implementation of this Construction Traffic Control Plan will achieve this stated trip reduction. List the documents that support the conclusions. This can be added to the study in Appendix T and summarized in the main application document.

Please provide a mitigation measure that includes a list of requirements that will be part the Construction Traffic Control Plan (e.g., ride share program, alternative work schedules, list of permits required).

DR TRANS-2. If there is a local vehicle-miles traveled (VMT) analysis methodology, please describe it and apply it to the project calculation of VMT impacts and conclusions. If there is not local VMT analysis methodology, please use the Governor's Office of Planning and Research (OPR) new California Environmental Quality Act (CEQA) guidelines methodology. Please include expected project traffic by roadway, percent traffic increases by roadway, a discussion of impacts on key intersections and road segments. Please include a list of needed road and traffic control improvements at the proposed site access points. List the thresholds of significance used and describe the methodology used.

DR TRANS-3. Calculate and list estimated one-way trip lengths for workers, deliveries, and truck haul trips generated during the construction and operation of the project.

DR TRANS-4. Please describe public roadways and intersections that would be temporarily or permanently altered during construction including the duration of activities. Provide a description of the access points for the site during construction.

DR TRANS-5. Please provide more detail about project-related hazardous materials to be transported to or from the project during project construction and operation.

Please list the estimates quantities, number of trips, anticipated routes, means of transportation, and any hazards associated with such transport.

DR TRANS-6. Please provide a list of agency and official contact phone numbers related to transportation.

TRANSMISSION SYSTEM DESIGN

CEQA requires the identification and description of the "Direct and indirect significant effects of the project on the environment." The Opt-In Application requires discussion of the "energy resource impacts which may result from the construction or operation of the power plant." For the identification of impacts on the transmission system resources and the indirect or downstream transmission impacts, staff relies on the Phase I and Phase II Interconnection Studies to ensure the interconnecting grid meets the California Independent System Operator (California ISO) reliability standards. The studies analyze the effect of the proposed project on the ability of the transmission network to meet reliability standards. When the studies determine that the project will cause a violation of reliability standards, the potential mitigation or upgrades required to bring the system into compliance are identified. The mitigation measures often include the construction of downstream transmission facilities. CEQA requires the analysis of any downstream facilities for potential indirect impacts of the proposed project. Without a complete Phase I or Phase II Interconnection Study, staff is not able to fulfill the CEQA requirement to identify the indirect effects of the proposed project.

Complete descriptions of the of the project transmission and interconnection facilities are also required to determine whether the project, as proposed, would comply with General Order (GO) 95 ,128 and 131-D construction standards. Therefore, please provide following information:

DR TSD-1. Please discuss GO 95, 128 131-D standards in reference to the project design and construction process, such as grounding details, capacity banks and lighting arrestor at the substations voltage stability, volt-ampere reactive (VAR) support etc. if there are any potential consequences then the applicant shall propose mitigation measures. Please provide the expected Electro Magnetic Field and Electric Field values, below the gen-tie and loop in line.

DR TSD-2. Please provide a one-line diagrams of the proposed project substation, and switchyard. Show all the equipment ratings, including the bay arrangement of the breakers, disconnect switches, buses, and other equipment that would be necessary for the interconnection of the project.

Indicate the number of poles necessary to construct the gen-tie in both options that have been proposed. Please provide gen-tie conductor type, size, and current carrying capacity.

DR TSD-3. Please provide California ISO cluster study (QC14) phase I, and II study

reports. Additionally, provide all the system impact reports (SIS) that have been prepared by the neighboring utilities due to the impacts caused by the QC14 phase I interconnection study, such as Salt River Project's (SRP) impact report, Arizona Public Service (APS), El Centro Nacional de Control de Energía (CENACE), and Imperial Irrigation District (IID) impact reports.

DR TSD-4. If the California ISO Phase I or (when available) Phase 2 Interconnection Study indicate that the Perkins Renewable Energy Project cannot be reliably connected to the San Diego Gas & Electric (SDG&E) grid without additional transmission facilities not analyzed in the Opt-in Application, please provide the necessary information to support a CEQA analysis for all downstream upgrades needed for the Perkins Renewable Energy Project.

Proposed modifications to SDG&E owned and operated transmission facilities, and the proposed transfer of ownership of transmission facilities may require approval from the California Public Utilities Commission.

DR TSD-5. Please provide an expected schedule for necessary approvals from the California Public Utilities Commission.

VISUAL RESOURCES

DR VIS-1. Please provide camera type, lens focal length, viewing angle; date and time the photograph was taken, and the distance to the project.

DR VIS-2. Please provide the photo-realistic simulation one year after completion of construction.

DR VIS-3. Please provide all the full-page color digital high-resolution files of the key observation point (KOP) photographs and photo-realistic simulations of at least 600 dots per inch depicting representative above ground section of the transmission route after construction.

DR VIS-4. Please provide 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 county government code.

DR VIS-5. Please provide a list of the project-specific luminaires, identify the design (e.g., full cutoff, semi cutoff, non-cutoff) and indicate if 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.

DR VIS-6. Please provide 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.

DR VIS-7. Please provide a schedule indicating when permits outside the authority of the CEC will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

WATER RESOURCES

The application does not appear to include figures that depict site-specific drainage patterns before and after project construction, especially near major project features. These figures will also support the State Water Resources Control Board's (SWRCB's) review of the project for enrollment under the Construction General NPDES Permit.

DR WATER-1. Please provide figures that display the drainage patterns of the project site before and after project construction, with emphasis on the major site features, such as the BESS, project substation, operations and maintenance (O&M) facility, breaker-and-a-half (BAAH) switchyard, and the loop-in transmission line.

Appendix G, 2-D Hydraulic Study Summary Analysis of Findings, summarizes the results of the hydraulic model but does not include the supporting calculations.

DR WATER-2. Please provide the calculations that support the 2-D hydraulic model.

Subsection 4.15.4, page 4.15-30 of the application lists a Groundwater Monitoring, Reporting, and Mitigation Plan (GWMRMP) along with three other mitigation plans included as appendices to the application. However, the GWMRMP was not included as an appendix to the application. Moreover, the application cover letter identifies Appendix V, Groundwater Resources Technical Report, as pending and will be submitted in April 2024. Both these documents shall provide details regarding the chemical and physical characteristics of project site groundwater, as well as how it will be produced, which will be crucial for evaluating the impact to this resource as a water supply.

DR WATER-3. Please provide the Groundwater Monitoring, Reporting, and Mitigation Plan as an appendix to the application.

DR WATER-4. Please provide Appendix V, Groundwater Resources Technical Report.

Per Appendix B (g) (14) (A) (i), the project requires Waste Discharge Requirements (WDRs) for the Discharge of Dredged or Fill Materials to Waters of the State. The applicant has provided a draft version of this form (TN254447), as well as draft Attachment A, Supplemental pages (TN254446). This process is necessary since the project will include the application of native fill to ephemeral drainages to construct PV panels and project fencing as described in Table 3 of Attachment A.

In addition to the data request below, please be advised of the following:

- When submitting your discharge of dredged or fill materials application, please provide the Regional Board with copies of any other federal/state permits applied for or obtained, a restoration plan for temporary impacts, and final CEQA documents.
- The project may require WDRs for dewatering and the discharge of well pump test water when drilling production wells on-site, depending on where the discharge is occurring. These discharges are permitted through State Board Order No. 2003-0003-DWQ-Statewide General WDRs for Discharges to Land with a Low Threat to Water Quality. To obtain coverage under this General Order, please provide a completed Notice of Intent (NOI) as provided in Attachment 3 of Order 2003-0003-DWQ, a project map, evidence of compliance with CEQA, and a discharge monitoring plan (DMP).
- The project requires enrollment under WQ 2022-0057-DWQ and CAS000002 (Construction General Permit). The Construction General Permit requires submission of an NOI, a Risk Level Determination, a Site-Specific Stormwater Pollution Prevention Plan, site drawings, and maps. The Permit Registration Documents are submitted electronically through the Stormwater Multiple Application and Report Tracking System (SMARTS). As the SWRCB has a 90-day window to review the application for coverage under the Construction General Permit, please apply as early as possible.

DR WATER-5. Please provide a draft compensatory mitigation plan and Tier 3 alternatives analysis that complies with the SWRCB policy for State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State.

WORKER SAFETY

The location of this proposed project in the southern desert of California adjacent to the Mexican border has experienced multiple days of high heat (95 degrees Fahrenheit and above as defined by 8 CCR 3395) in the past decade. In fact, during the summer of 2023, El Centro recorded 54 consecutive days of temperatures greater than 100 F from June 25 through August 17 with many days greater than 110 degrees Fahrenheit (weather.com). Although this important worker safeguard is included in Table 4.17-1, it needs to be discussed and described more fully.

DR WS-1. Please include discussions of the implementation of 8 CCR 3395 Heat Illness Prevention during construction and operations.

Additionally, the proposed project is also located in an area that includes the habitat of the Green Mojave Rattlesnake, a notoriously aggressive snake with potent neurological and/or hemorrhagic venom. Some power plants under CEC jurisdiction (e.g., High Desert Power Plant in San Bernardino County) experienced problems when these

creatures sought shade under parked vehicles and therefore installed snake fences to protect on-site workers, vendor delivery, and visitors when parking their cars and returning to them.

DR WS-2. Please provide a discussion of the necessity of constructing snake fences as part of the perimeter security fence and if included a description of those fences.

Also, the project will include a BESS and “could use any commercially available battery technology, including but not limited to lithium-ion, LFP (lithium iron phosphate), NMC (nickel manganese cobalt), or NCA (nickel cobalt aluminum). Staff needs a more specific decision at this time in order to conduct an analysis of impacts.

DR WS-3 Please state which BESS system will be chosen and if it will include internal heat removal, fire detection, and fire suppression systems. Please describe these systems in detail and also if automatic water addition to the electrolyte solution will be used.

This also includes information regarding Fire, Emergency Medical Services (EMS), and rescue, particularly during construction when 700 workers could be present on site, as it is an important element for the project’s construction safety program. Given the climate and soil characteristics for this site, trench collapses and heat illnesses are very possible, injuries often occur, and fires have the potential to occur at any time.

DR WS-4. Please provide more detailed information on the Fire, EMS, and rescue capabilities available from the Imperial County, El Centro, and BLM Fire Departments including response times.

According to the California Department of Public Health, cases of Valley Fever (caused by *Coccidioides immitis*, a fungus that grows in the soil in some areas of California, the southwestern United States, and northern Mexico and released during soil disturbances) have been on the rise since 2014 and have greatly increased since 2022. Although most of these cases have been in the central valley of the state, there has been an increase of cases in Imperial County since 2014.

DR WS-5. Please provide details and discussion on the measures which would be implemented to protect workers from exposure to Valley Fever.