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January 13, 2025

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Re: CURE Data Requests Set 2 for Willow Rock Energy Storage Center (21-AFC-02)

Dear Mr. Harris:

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

Pursuant to the *Order Granting In Part and Denying In Part Applicant's Motion to Amend Revised Scheduling Order* (TN 260601), written responses to these requests are due on or before January 27, 2025.

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

Sincerely,

Richard Franco

RMF:acp

5260-073acp

STATE OF CALIFORNIA

State Energy Resources Conservation and Development Commission

In the Matter of:	
WILLOW ROCK ENERGY STORAGE CENTER	Docket No. 21-AFC-02

CALIFORNIA UNIONS FOR RELIABLE ENERGY DATA REQUESTS SET 2

January 13, 2025

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Attorneys for California Unions for Reliable Energy

The following data requests are submitted by California Unions for Reliable Energy ("CURE"). Please provide your responses as soon as possible, but no later than January 27, 2025, to:

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

WILLOW ROCK ENERGY STORAGE CENTER
CURE Data Requests Set 2 (Nos. 105-173)

ALTERNATIVES

BACKGROUND: DRAFT PHASE I ESAs FOR VH SITE AND OT SITE

The Applicant added four sites to the Alternatives analysis in the SAFC and California Energy Commission ("CEC") Staff requested in its Data Requests Set 1, Request No. 2 additional information regarding these sites. (TN 258681 at page 2) The Applicant responded in part that "The Draft Phase I ESAs for the VH Site and OT Site will be submitted simultaneous to this document through Kiteworks under the reference Attachments DR-2-5 and DR-2-6, respectively." (TN 258681 at page 2)

DATA REQUESTS:

105. Provide the Draft Phase I ESAs for the VH Site and OT Site once submitted through Kiteworks under the reference Attachments DR-2-5 and DR-2-6, respectively.

BACKGROUND: MODELING INPUT AND OUTPUT FILES

In the SAFC, the construction air quality impact results showed exceedances of the federal and state 1-hr NO_2 standards. (TN 254806 at page 5.1-23) The SAFC also remodeled the no-architectural berm Project concentrations for 1-hr NO_2 assuming that the truck fleet used to transport the construction spoils offsite would be equipped with Tier 4 emission standards. (*Ibid.* at page 5.1-22) The remodeled emissions still showed exceedances of the Federal ambient air quality standard for the no-architectural berm option. (*Ibid.* at page 5.1-24)

In Data Request Set 2 No. 25, CEC Staff asked the Applicant to *"refine the 1-hour NO2 modeling for construction phase, including both the no-architectural berm and architectural berm options."* (TN 258630 at page 2) The Applicant submitted new modeling input and output files in response as Attachment DR 25-1 via Kiteworks file transfer system. (TN 259220 at page 1)

DATA REQUESTS:

106. Provide the modeling input and output files in Attachment DR 25-1 submitted via Kiteworks.

BACKGROUND: MONITORING STATIONS

Three monitoring stations are relied upon in the SAFC to assess criteria pollutant concentrations: Kern Route 58 Business (Kern County), Lancaster (Los Angeles County), and Victorville Park Avenue (San Bernardino County). (TN 254806 at p. 5.1-18) The highest background concentrations for the most recent 3-year period (2019 to 2023) were utilized to establish baseline air quality values for modeling purposes. (*Ibid*.) For certain pollutants, such as annual PM2.5 and SO2, the standards are based on a three-year average. (*Ibid*.) The SAFC claims these stations are the closest with the most representative and complete monitoring data relative to the Project site. The SAFC does not provide a specific rationale for using multiple monitoring stations, with Lancaster located approximately 15 miles from the site and Victorville Park about 77 miles away.

The use of multiple monitoring stations across varied locations may lead to an inaccurate representation of ambient air conditions within the Project area. Although the Lancaster station would be the most representative of the three identified stations, the Mojave Pat Avenue

monitoring station, located approximately 12.8 miles from the Project area, may offer a more accurate reflection of local air conditions.

DATA REQUESTS:

107. Explain why three monitoring stations are used to assess criteria pollutant concentrations.

BACKGROUND: BLM ROW APPLICATION

The Applicant submitted an Application for Transportation, Utility Systems, Telecommunications and Facilities on Federal Lands and Property ("SF299 Application") to the Bureau of Land Management ("BLM") in August of 2024. (SF299 Application (2024)) A Plan of Development ("POD") was also submitted with the SF299 Application. (POD (2024))

The POD explains that the Antelope Valley-East Kern Water Agency ("AVEK") will supply the Project with the required water. (*Ibid.*) The POD states that the Applicant has filed an application for water service with AVEK and is in the process of securing a water service agreement. (*Ibid.*)

The POD also indicates that a geotechnical investigation along the 19-mile gen-tie route is necessary but has not yet occurred. (*Ibid.*) The POD estimates that the geotechnical investigation would occur prior to finalizing the Project design and would involve a subsurface evaluation as well as laboratory testing. (*Ibid.*) This geotechnical analysis would inform a geological profile and provide information about the soils conditions that may affect the engineering design of the gen-tie foundation structures.

Finally, the SF299 Application acknowledges that spills of fuels or hydraulic fluids could occur during construction.

DATA REQUESTS:

108. Discuss the status of the Applicant's application for water service submitted to the AVEK and whether a water service agreement has been reached.

109. State whether any geotechnical investigations or studies have been conducted along the 19-mile gen-tie route.

110. Describe the soil conditions that could affect the engineering design of the gen-tie foundation structures.

111. Explain the available alternatives or contingencies if the geotechnical investigations along the gen-tie route present a geologic profile that would affect the engineering design of the gen-tie foundation structures.

112. Describe the methods, procedures, or plans to address or contain any spills of fuels or hydraulic fluids during construction.

REFERENCES:

SF299 Application (2024) – GEM A-CAES LLC, *Application for Transportation, Utility Systems, Telecommunications and Facilities on Federal Lands and Property* (August 2024).

POD (2024) – GEM A-CAES LLC, *GEM A-CAES LLC Willow Rock Energy Storage Center Gen-Tie Line Plan of Development* (August 2024).

BACKGROUND: RELIABILITY

CEC Staff previously asked the Applicant about whether the WRESC facility could be designed with redundant systems such as above ground compressed air storage tanks, and if the facility could construct dual caverns to address potential maintenance and inspection related challenges. (TN at p. 7) The Applicant responded that "Above-ground air storage vessels are not economically viable; they have been contemplated by Hydrostor and other compressed air technology suppliers in the past and the terrestrial pressure vessel cost is vastly greater than an underground storage cavern." (*Ibid.*) The Applicant also explained that "[c]instruction of dual caverns with separate dedicated Air and Water Shafts for each cavern will be cost-prohibitive and will lead to very long construction phases, jeopardizing the project viability." (*Ibid.*)

DATA REQUESTS:

113. Provide the analysis supporting the lack of economic viability for above-ground air storage vessels for this Project.

114. Provide the analysis supporting the statement that construction of dual caverns would be cost-prohibitive and would lead to long construction phases for this Project.

BACKGROUND: TRANSMISSION LINE OREINTATION

In its Data Requests Set 2, CEC Staff asked the Applicant to provide a Phase I Environmental Site Assessment for areas of ground disturbance along the transmission line because no such assessment is included for the transmission line between the Project and the Southern California Edison ("SCE") Whirlwind Substation. (TN 258630 at pages 3-4) Without this analysis, CEC Staff stated, "Potential sources of known or suspected

environmental contamination at the WRESC or along the transmission line have not been discussed." (*Id.* at page 3) In Data Request No. 35, CEC Staff specifically asked for the locations of anticipated ground disturbance along the transmission line, including anticipated surface areas and depths.

In response, the Applicant provided Attachment DR 35-1, which includes a map that shows the proposed location of transmission line poles between the Project site and the SCE Whirlwind Substation. (TN 259220 at page 7) Attachment DR35-1 also shows the location of undergrounding associated with the gen-tie line. (*Ibid.*) Attachment DR35-1 was submitted through Kiteworks. (*Ibid.*)

DATA REQUESTS:

115. Provide Attachment DR35-1 submitted via Kiteworks.

BIOLOGICAL RESOURCES

BACKGROUND: BASELINE CONDITIONS FOR BIOLOGICAL RESOURCES

Three core holes (ZEV-CH-01-23, ZEV-CH-02-23, and ZEV-CH-03-23) were drilled between March 17, 2023, and October 21, 2023 on and around the WRESC site for the Project's subsurface geotechnical investigation. (TN 254804 at p. 3-1) The three core holes were drilled to depths of 3,015 to 3,167 feet bgs using initial rotary drilling followed by setting HW casing from ground surface to 70 to 171 feet bgs and then implementing HQ rock coring methods. (TN 254806 at p. 5.4-1)

The WRESC site hosts several special-status plants, including WJTs. (TN 254806 at p. 5.2-32) For WJTs specifically, the Western Joshua Tree Conservation Act was enacted in July 2023 and prohibits the importation, export, take, possession, purchase, or sale of any western Joshua tree in California unless authorized by the California Department of Fish and Wildlife's ("CDFW").

DATA REQUESTS:

116. Explain whether any WJTs were removed or impacted to conduct this geotechnical investigation.

117. Explain whether any other special-status species were removed or impacted to conduct this geotechnical investigation.

BACKGROUND: NOISE IMPACTS ON BIOLOGICAL RESOURCES

CEC Data Requests Set 4 No. 100 requested detailed analyses of noise and vibration impacts resulting from the drill-and-blast method or other blasting method, as it relates to biological resources. (TN 259326 at p. 8) The Applicant responded that "most wildlife will respond to noise levels around 40 to 50 dBA," and that "noise from construction is expected to attenuate to 45 dBA approximately 4,000 ft from the WRESC" (although this statement is inconsistent with the noise measurements in Table 5.7-9 in the SAFC). (TN 259736 at p. 12) The Applicant concluded that "wildlife that occur within this zone during construction are expected to have a level of habituation to anthropogenic noise and human activity." (*Ibid.*)

DATA REQUESTS:

118. Provide the information to support the statement that "wildlife that occur within this zone during construction are expected to have a level of habituation to anthropogenic noise and human activity."

BACKGROUND: RAVEN MANAGEMENT MEASURES

Table 1 in the Draft Raven Management Plan lists several raven management measures. (TN 259675, Attachment DR45-1) Section 2.0 of the Draft Raven Management Plan states that "[r]aven management measures outlined in Table 1 are based on guidance from Alternative A of the USFWS Draft Environmental Assessment to Implement a Desert Tortoise Recovery Plan Task: Reduce Common Raven Predation on the Desert Tortoise (USFWS 2008)." However, Alternative A is the "no action" alternative, which involves implementation of only a few raven management efforts by various federal, state, and local agencies. Moreover, the U.S. Fish and Wildlife Service's ("USFWS") *Draft Environmental Assessment to Implement a Desert Tortoise Recovery Plan Task: Reduce Common Raven Predation on the Desert Tortoise* determined that Alternative A would have a moderately adverse effect on desert tortoise populations, and that hundreds of juvenile desert tortoises would continue to be killed by ravens each year.

DATA REQUESTS:

119. Specify which raven management measures from the "no action" alternative (i.e., Alternative A) in the USFWS' Draft Environmental Assessment to Implement a Desert Tortoise Recovery Plan Task: Reduce Common Raven Predation on the Desert Tortoise will be implemented or utilized for this Project.

BACKGROUND: NEST MANAGEMENT

The Draft Raven Management Plan states that "[p]otential measures, such as removal of raven nests in off-breeding seasons, may be required and will be determined in consultation with USFWS." (TN 259675, Attachment DR45-1) The draft plan does not identify who would be responsible for removal of raven nests and also does not discuss actions that would be taken to prevent ravens from rebuilding nests at locations where nests are removed.

The Draft Raven Management Plan states that anthropogenic structures and gen-tie lines offer raven nesting opportunities. (*Ibid.*) The draft plan does not discuss measures that would be implemented to prevent ravens from nesting on the Project's structures (e.g., buildings, tanks, etc.). However, for the Project's utility poles, the draft plan states that "[w]here feasible, the proposed project will utilize nest discouragers according to Avian

Power Line Interaction Committee (APLIC) guidelines that limit establishment of raven nests (APLIC and USFWS 2005)." (*Ibid.*) The potential efficacy of this proposed measure is uncertain because the Draft Raven Management Plan does not include a feasibility assessment.

The Draft Raven Management Plan identifies raven management measures pertaining to Anthropogenic Food and Water Sources, Nest Management, Dead Animals, and Worker Environmental Awareness. Measures pertaining to Anthropogenic Food and Water Sources would be implemented during construction and operation; however, all other measures would be confined to "pre-construction and construction." (*Ibid.*) The Draft Raven Management Plan does not explain why Nest Management, Dead Animal, and Worker Environmental Awareness measures would only be necessary during the pre-construction and construction phases of the Project.

DATA REQUESTS:

120. State who will be responsible for nest removal.

121. State whether modification to existing structures was analyzed or considered to reduce or eliminate the likelihood of the structures being reused as nest sites by ravens after nests are removed.

122. Explain why nest discouragers would be infeasible.

123. Identify the specific nest discouragers that may be implemented for this Project.

124. Identify the design elements would be incorporated into the Project's new structures to minimize raven use (e.g., perching and nesting).

125. Describe the measures that would be implemented to prevent ravens from acquiring water from the Project's stormwater pond.

126. Explain whether the liner on the hydrostatically compensating surface reservoir would prohibit ravens and other wildlife from acquiring water from the reservoir (e.g., from around the edge of the reservoir).

127. Explain how water will be prevented from pooling on Project components that have flat roofs after storm events.

BACKGROUND: COMPLIANCE REPORTS

A key component of integrated predator management is to monitor the effectiveness of the management action in meeting the stated objective. According to the Draft Raven Management Plan, the objective is to "reduce potential direct and cumulative effects of raven predation on desert tortoise and other native wildlife species with respect to the Project Area." (TN 259675, Attachment DR45-1) The draft plan does not identify the monitoring actions that would be taken to evaluate the success in achieving this objective. Furthermore, although the draft plan states that "[c]ompliance reports will be submitted to the CEC and USFWS," it does not provide a timeline for reporting and does not identify the information that would be included in the compliance reports. (*Ibid.*)

DATA REQUESTS:

128. State how often compliance reports will be submitted to the CEC and USFWS.

129. Describe the performance standards for the Draft Raven Management Plan.

130. Explain what actions will be taken for raven management during operations.

BACKGROUND: DRILLING AND CONTROLLED DETONATION METHOD

The Applicant responded to CEC Data Requests Set 4 No. 97 that "[t]he controlled detonation [sic] design parameters and materials have not yet been designed for the subsurface given that the comprehensive deep geotechnical exploration and testing program is yet to conclude." (TN 259736 at p. 9) The Applicant estimated that "a drilling and controlled detonation method will be selected during the first quarter of 2025." (*Ibid.*)

DATA REQUESTS:

131. Describe the drilling and controlled detonation method selected for the Project.

132. Explain the rationale for selecting this drilling and controlled detonation method for the Project.

133. If a drilling and controlled detonation method has not yet been selected, explain why.

134. If a site-specific detonation method has been selected, provide calculations for potential noise and vibration impacts and identify mitigation measures, if any.

BACKGROUND: ONGOING GEOTECHNICAL INVESTIGATION

The *Geotechnical Characterization Report for the Willow Rock-Dawn Road Project Site* (2024) by Agapito Associates, Inc. in SAFC Appendix 5.4-A ("Agapito 2024 report") explains that the geotechnical design parameters in the report "support the pre-FEED study for cavern construction." (TN 254804 at p. 5-1) The Agapito 2024 report recommends that "[t]hese values should be reevaluated as new information is collected from the ongoing core drilling program, and as additional information becomes available during project design." (*Ibid.*)

DATA REQUESTS:

135. State whether the analysis, calculations, and/or findings in the Agapito 2024 report have been reevaluated or revised.

136. Describe any changes to the geotechnical design parameters in the Agapito 2024 report.

137. State whether the core drilling program is ongoing.

138. If the core drilling program is ongoing, describe what activities are currently occurring.

139. If the core drilling program is ongoing, describe the estimated duration of each activity currently occurring.

140. State whether any additional core drilling activities are planned at a future date and when.

BACKGROUND: SUBSURFACE ROCK MASS HYDRAULIC CONNECTIVITY

Packer testing at deep exploration boreholes has been conducted to estimate the hydraulic conductivity of the underground rock mass surrounding the Project's proposed underground cavern. (TN 259675 at p. 18) This information is important for several reasons, including, but not limited to, the volume of water that could migrate to surrounding rock formations. As of October 2024, packer testing in a sixth deep exploration borehole was ongoing. (*Ibid.*)

DATA REQUESTS:

141. State whether the packer testing in the sixth deep exploration borehole is complete and if not, provide an estimated timeframe for completion.

142. If the packer testing in the sixth deep exploration borehole is complete, disclose the findings from the packer testing in the sixth deep exploration borehole.

143. If the packer testing in the sixth deep exploration borehole is complete, provide the reports, data, and information related to this testing.

BACKGROUND: LEAKAGE ANALYSIS

In response to CURE's Data Request Set 1 No. 104, the Applicant describes the framework for the forthcoming leakage analysis to assess the cavern's water and gas containment properties. (TN 259338) The objective for

the leakage analysis is described by the Applicant as "[m]odel[ing] how air and water will flow into and out of the rock mass during compression/generation cycle to estimate potential leakage rates into and from the rock mass." (*Ibid.*) Three charging/discharging/standby scenarios are to be considered in the leakage analysis. (*Ibid.*) "The threshold of acceptability of leakage is <2% per day." (*Ibid.*)

DATA REQUESTS:

144. Provide a copy of the leakage analysis report.

145. If the report is still incomplete, estimate a date or timeframe for when the report will be docketed.

146. Identify the potential leakage rates into and from the rock mass.

147. State whether any underground temperature readings have been measured.

148. If temperature measurements or data are available, provide the temperature data.

149. If temperature measurements or data are available, explain the methods implemented to obtain this data.

150. Discuss how underground temperature(s) affect the Project's leakage rates and hydraulic connectivity.

BACKGROUND: CAVERN SEAL FAILURE

The Risk Analysis for the Silver City Energy Storage Project, which proposes to use Hydrostor's proprietary advanced compressed air energy storage technology, identifies structural failure due to cavern seal failure as a rare but catastrophic risk. (Risk Analysis (2023)) The analysis explains that the failure of the cavern seal may result from seal fatigue from repeated pressurization and de-pressurization or errors during the construction of the seal. (*Ibid.*) The SAFC does not disclose or analyze potential hazards from cavern seal failure.

DATA REQUESTS:

151. State whether a risk assessment has been performed for this Project.

152. Discuss whether there is a risk of cavern seal failure for this Project.

153. Describe the methods or procedures to address or avoid cavern seal failure.

REFERENCES:

Risk Analysis (2023) - *Appendix 16, Risk Analysis for the Silver City Energy Storage Project* (May 26, 2023), available at: https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-47065463%2120230814T003409.055%20GMT.

BACKGROUND: WATER INFLOW

A Draft Emergency Action Plan was docketed by the Applicant as Attachment DR75-1 to its responses to CEC Data Requests Set 3. (TN 259675 at Attachment DR75-1) "Water Inflow" is identified as a potential emergency situation. (*Id.* at pp. 2-3) This event is not discussed in detail in the SAFC. The Draft Emergency Action Plan distinguishes between a "Minor Water Inflow" and an "Extreme Water Inflow." The emergency procedures differ between the two emergency situations as follows:

- Minor Water Inflow – Notify shift superintendent. Check for methane in the area of inflow. Develop remedial action as required, in conjunction with Marathon;

- Extreme Water Inflow – Shut down the source of the inflow if possible. If the inflow is from the ground, evacuate immediately. Shut down all electrical power to equipment. Check methane levels during evacuation. (*Ibid.*)

DATA REQUESTS:

154. Describe a "Minor Water Inflow" event as identified in Attachment DR75-1 in TN 259675.

155. Describe an "Extreme Water Inflow" event as identified in Attachment DR75-1 in TN 259675.

156. Explain the factors that distinguish a "Minor Water Inflow" from an "Extreme Water Inflow."

157. Describe how methane may be released in the event of water inflow as described in Attachment DR75-1 in TN 25967.

158. Specify the mitigation measures, if any, to address potentially significant impacts from water inflow.

BACKGROUND: CONSTRUCTION NOISE ANALYSIS AND USAGE FACTORS

The Project's construction noise impact analysis was performed using CadnaA software. Section 5.7 of the SAFC states the "usage factors" for equipment. The information appears to be provided in the form of hours per 24-hour day, listed in SAFC Table 5.7-8. Table 5.7-8 discloses the construction noise source data and shows the construction noise source inputs as octave band levels. The CadnaA software allows the user to input source parameters as sound power or sound pressure levels, number of minutes/usage rate, or a daily schedule. The output of this software can show various metrics, such as an hourly Leq or a daily Ldn. It is not clear if the noise model assumed all equipment would be operating during the busiest time(s) of the day or distributed the usage hours over a time range (e.g., 8 usage hours applied over a 15-hour daytime hour period).

SAFC Table 5.7-9 shows the "modeled construction noise," which are also shown as noise contours in SAFC Figures 5.7-4 and 5.7-5. The metrics are not labeled.

DATA REQUESTS:

159. Explain how the usage hours are applied for equipment in Table 5.7-8.

160. State which metric is shown in the results (Table 5.7-9 and Figures 5.7-4 and 5.7-5), e.g., hourly Leq or daily Ldn.

BACKGROUND: NIGHTTIME CONSTRUCTION NOISE

The SAFC at p. 5.7-15 states that "(c)avern work is proposed to be conducted 24 hours a day for a period of time with an estimated eight pieces of surface equipment operating at night to support that underground work." Table 5.7-7 explains that nighttime work would include "rock handling on the surface" to support the underground cavern construction activities. The SAFC at p. 2-31 also estimates that "rock crushing" will occur onsite for up to 10 hours per day but does not provide the time of the day for rock crushing.

DATA REQUESTS:

161. Describe the activities involved with rock handling on the surface, as described in SAFC Table 5.7-7.

162. Describe the activities involved with rock crushing, as described on page 2-31 of the SAFC.

163. Estimate the number of hours for rock handling on the surface, as described in SAFC Table 5.7-7.

164. Estimate the number of hours per day rock crushing will occur during the daytime.

165. Estimate the number of hours per day rock crushing will occur during the nighttime.

166. Describe the type and number of noise-generating equipment (e.g., crushers, loaders, haul trucks) for rock handling at night. Include height above ground level for sound sources and sound levels for each source.

167. Describe the type and number of noise-generating equipment (e.g., crushers, loaders, haul trucks) for rock crushing at night. Include height above ground level for sound sources and sound levels for each source.

168. Identify the locations where the rock handling and rock crushing activities will occur.

BACKGROUND: OPERATIONAL NOISE

No time weighting was used for the operational sources based on Appendix 5.7E and no usage factors for the equipment used during operations is provided in SAFC Table 5.7-11. It therefore seems that the equipment was modeled at 100% operation.

Additionally, SAFC Table 5.7-12 shows the "modeled operational noise levels at residential receptors," which are also shown as noise contours in SAFC Figure 5.7-6. The metrics are not labeled.

DATA REQUESTS:

169. State whether equipment was modeled at 100% operation.

170. State which metric is shown in the noise modeling results (Table 5.7-12 and Figure 5.7-6), e.g., hourly Leq or daily Ldn.

BACKGROUND: BACKGROUND NOISE LEVELS

The SAFC utilizes the L90 metric to define the noise level that is exceeded 90% of the time, commonly used to represent background noise. Table 5.7-3 in the SAFC describes the monitoring locations included in the baseline noise study. This table shows that 25-hour noise surveys were performed at CML-1 and CML-6 (only CML-1 is located near residential areas as depicted in Figure 5.7-1). Table 5.7-3 also shows that nighttime conditions were documented with 15-minute duration short-term measurements at ML-2, ML-3, and ML-4 as listed in Table 5.7-3. The information is Table 5.7-3 is inconsistent with the information in Table 5.7-4. Table 5.7-4 shows nighttime noise data collected at ML-2 (00:20 or 12:20 AM), ML-4 (23:08 or 11:03 PM), and ML-5 (22:22 or 10:22 PM), but not ML-3.

DATA REQUESTS:

171. Clarify where nighttime noise measurements (ML-2, ML-3, ML-4, ML-5) were taken and whether information was extrapolated from other locations given the inconsistencies between Tables 5.7-3 and 5.7-4.

172. Provide revised versions of Table 5.7-3 and 5.7-4.

173. Provide temperature data during the background noise survey, if available.

Dated: January 13, 2025

Respectfully submitted,

Original Signed by:

/s/ Richard Franco

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