

<b>DOCKETED</b>	
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<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	261072
<b>Document Title:</b>	Willow Rock Data Requests Set 6
<b>Description:</b>	Willow Rock Data Requests Set 6 - biological and water resources
<b>Filer:</b>	Kaycee Chang
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	1/13/2025 4:55:12 PM
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January 13, 2025

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

**Data Requests Set 6 for Willow Rock Energy Storage Center (21-AFC-02)**

Dear Curt:

Pursuant to California Code of Regulations, title 20, section 1716, California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 6, which is necessary for a complete staff analysis of the Willow Rock Energy Storage Center (WRESC) under the Warren-Alquist Act and California Environmental Quality Act (CEQA).

Responses to the data requests are due to staff by January 27, 2025. If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send written notice to me and the Committee within 10 days of receipt of this letter. Such written notification must contain the reasons for not providing the information, the need for additional time, or the grounds for any objections (see California Code of Regulations, title 20, section 1716 subd. (f)).

If you have any questions, please email me at [Kaycee.Chang@energy.ca.gov](mailto:Kaycee.Chang@energy.ca.gov).

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Kaycee Chang  
Supervisor, CEQA Project Management Unit

Enclosure: Data Requests Set 6

# **WILLOW ROCK ENERGY STORAGE CENTER DATA REQUESTS SET 6**

## **BIOLOGICAL AND WATER RESOURCES**

### **BACKGROUND**

As a follow up to Data Request 69 (Data Requests Set 3; TN 259256), the Lahontan Regional Water Quality Control Board (RWQCB) has requested information required to permit the proposed evaporation pond under California Code of Regulations (CCR), Title 27. This information was not previously provided in the report of waste discharge (ROWD), although the applicant did supply some information in their data request response.

### **DATA REQUEST**

121. Please provide the following information so the RWQCB may prepare waste discharge requirements (WDRs) for the proposed evaporation pond under CCR Title 27:

- 1) Geology / Hydrogeology / Groundwater Quality
- 2) Waste Characterization / Waste Classification
- 3) Waste Management Unit
  - a) Detailed Surface Impoundment Design Plan
    - i) Specified liner components
    - ii) Action Leakage Rate
  - b) Construction Quality Assurance Plan for the Surface Impoundment
- 4) Detection Monitoring Program (Water Quality Monitoring)
  - a) Unsaturated zone monitoring (e.g., pan lysimeter)
  - b) Groundwater monitoring downgradient of the pond
    - i) Establishment of Water Quality Protection Standards (background water quality)
- 5) Operations and Maintenance Plan
- 6) Closure/Post-Closure Plan
- 7) Known or Reasonably Foreseeable Release Plan

### **BACKGROUND**

If the berm around the compensation reservoir is or will be in excess of 6 feet in height, measured from the original grade, and would be storing more than 50 acre-feet of water, it would meet the definition of a jurisdictional dam pursuant to Water Code sections 6002 and 6003, which would require approval by the Division of Safety of Dams (DSOD) of California Department of Water Resources (DWR). However, the issuance of a certificate by CEC shall be in lieu of any permit, certificate or similar

## **WILLOW ROCK ENERGY STORAGE CENTER DATA REQUESTS SET 6**

document required by any state, local or regional agency under the Warren Alquist Act, including approval for jurisdictional dams. CEC Staff are coordinating with DSOD on whether the compensation reservoir meets applicable requirements for a jurisdictional dam. The applicant indicated in a previous communication that the berm would be outside the jurisdiction of the DSOD. Staff hereby requests information to resolve this discrepancy or all details about the berm and the compensation reservoir necessary for DSOD approval as a jurisdictional dam.

### **DATA REQUESTS**

122. Provide confirmation that the dam does not meet the definition of a jurisdictional dam in Water Code sections 6002 and 6003 or provide all information required by the DSOD to complete their review of the dam as a jurisdictional dam.

### **BACKGROUND**

The applicant provided a delineation of State waters in the Willow Rock Jurisdictional Waters Delineation Report (TN 258308). During the review of the report, staff, the California Department of Fish and Wildlife (CDFW), and the RWQCB, noted that there appeared to be numerous drainages that were not mapped or evaluated in the report. Most of these drainages appeared to be capable of conveying flow during storm events and therefore are likely to be considered jurisdictional by the CDFW and RWQCB. These areas were visible on aerial maps and were field verified by staff in the field. Staff requests the following data be provided. The RWQCB will use this data to prepare dredge and filling permit requirements.

### **DATA REQUESTS**

123. Update the Willow Rock Jurisdictional Waters Delineation Report to include the unmapped drainages.

124. Provide an assessment in tabular form of the expected temporary and permanent impacts to these features for all alignments and alternatives from the placement of the transmission line poles, access roads, and any other project feature. Include a description of the vegetation impacted and clarify if drive and crush, grading, or other methods would be required.

125. Provide a consolidated series of updated maps that identify drainage types, project features, vegetation communities, and temporary/permanent impacts.

### **BACKGROUND**

During a site visit on November 27, 2024, with staff and the applicant, the applicant indicated that they would be refining the Western Joshua tree (*Yucca brevifolia*) data to

## **WILLOW ROCK ENERGY STORAGE CENTER DATA REQUESTS SET 6**

be consistent with requirements of the Western Joshua tree mitigation program. In addition, the applicant noted they would be consolidating data collected over different periods of time.

### **DATA REQUESTS**

126. Provide the refined Western Joshua tree census data for the project in a single report.