

DOCKETED

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Project Title:	Sequoia Data Center
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Document Title:	C1-Santa Clara, LLC's Application for Confidential Designation
Description:	N/A
Filer:	Patty Paul
Organization:	C1-Santa Clara, LLC
Submitter Role:	Applicant Representative
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Docketed Date:	10/3/2019



October 3, 2019

Mr. Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: Application for Confidential Designation
RESPONSE TO DATA REQUEST 70
CHRIS LITERATURE SEARCH RESULTS
Sequoia Backup Generating Facility (19-SPPE-3)

Dear Mr. Bohan,

C1-Santa Clara, LLC (C1), as owner of Sequoia Backup Generating Facility (WBGF), requests that the attached information be designated confidential pursuant to 20 California Code of Regulations (CCR) Section 2505. This information is being supplied to the California Energy Commission (CEC) as Response to Data Request 70, CHRIS Literature Search Results.

In support of its Application for Confidential Designation, C1 provides the following information:

APPLICANT: C1-Santa Clara, LLC

ADDRESS: 2600 De La Cruz Blvd,
Santa Clara CA 95050

1(a). Title, date and description (including number of pages) of the record for which you request confidential designation.

CEC Staff Data Request 70 requests that copies of documents acquired from the Northwest Information Center (NWIC) of the California Historical
1720 Park Place Drive • Carmichael, CA 95608 • Tel • 916. 441.6574

Resources Information System (CHRIS) in support of the Application for SPPE for the SBGF. The reports responsive to this request are the subject of this Request For Confidentiality and are listed in the Attachment 1(a).

1(b). Specify the part(s) of the record for which you request confidential designation.

The reports identified above in 1(a) and Attachment 1(a), in their entirety:

2. State and justify the length of time the Commission should keep the record confidential.

The reports identified above should be kept confidential indefinitely to protect potential cultural resources and sites. If the descriptions of the locations of the sites are released to the public domain, there is potential for looting of that site.

3(a). State the provisions of the Public Records Act or other law that allows the Commission to keep the record confidential, and explain why the provision(s) apply to the record.

The reports identified above specifically identify areas of potential cultural and historical significance. It is thus protected under Government Code Sections 6254(e) and 6254(k). Protection provided is analogous to that given to Native American sacred places under Section 6254(r) of the Government Code.

3(b). Discuss the public interest in nondisclosure of the record. If the record contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please also state how it would be lost, the value of the information to the applicant, and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

The public interest will be served by nondisclosure by preventing looting of the cultural resources and sites described in the reports. Such looting would preclude scientific study of the sites to gain data about the cultural resources of the area.

4. State whether the record may be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the

identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why.

C1 believes the CEC staff will require the specific information contained in the reports to properly perform its analysis. Aggregation of the information would hinder a complete CEC analysis. However, C1 believes the CEC incorporate a generalized summary of information contained in the reports to properly state the basis for its analysis without disclosing information specific enough to facilitate looting.

5. State how the record is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred.

C1 has not disclosed any of the subject information to anyone other than its employees, attorneys, and consultants working on the SBGF. Moreover, this information will not be disclosed to any other persons employed by or working for C1 except on a "need to know" basis. C1 is marking this information "Confidential" and is instituting a policy that segregates this information from other SBGF files and that access to it be restricted to a designated confidential information manager or managers within C1 or its attorneys/consultants.

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct and complete to the best of my knowledge and I am authorized to make the application and certification on behalf of the applicant.



Scott A. Galati
Counsel to C1-Santa Clara, LLC

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
S-005311	Voided - E-786 SCL	1980	Robert Cartier and Charlene Detlefs	Archaeological Evaluation of the San Jose Municipal Airport.	Archaeological Resource Management	43-000433
S-008345	Caltrans - 04393-389131; Caltrans - 04393-396171; Voided - E-828 SCL	1980	Mara Melandry	Archaeological Survey Report, 04-SCL-101, Portions of P.M. 38.3/52.5, Improvements to Route 101 Between Route 17 in San Jose and Embarcadero Road in Palo Alto, Santa Clara County, 04393-389131, 04393-396171	California Department of Transportation, District 04	43-000441
S-008521	Submitter - ARS 79-78; Voided - E-1026 SCL	1979	Katherine Flynn	Archaeological reconnaissance of approximately 9 miles of Central Expressway from De La Cruz Boulevard to San Antonio Road (WO #872824) (letter report)	Archaeological Resource Service	
S-010001	Voided - S-10163; Voided - S-10251	1988	Rebecca Loveland Anastasio, Angela M. Banet, Donna M. Garaventa, Robert M. Harmon, and Michael R. Fong	A Cultural Resources Assessment for Proposed Widening and Improvements to Highway 101 Between Highways 280/680 and Trimble Road/De La Cruz Avenue, City of San Jose, Santa Clara County, California	Basin Research Associates, Inc.	43-000681, 43-000682, 43-000683, 43-000684, 43-000685, 43-000686, 43-000687, 43-000736
S-010001a		1988	Rebecca Loveland Anastasio, Angela M. Banet, Donna M. Garaventa, R. M. Harmon, Michael R. Fong, and Mella J. Rothwell	A Historic Properties Survey Report for Proposed Widening and Improvements to Highway 101 Between Highways 280/680 and Trimble Road/De La Cruz Avenue, City of San Jose, Santa Clara County, California	Basin Research Associates, Inc.	
S-010001b		1988	Rebecca Loveland Anastasio, Angela M. Banet, Donna M. Garaventa, R. M. Harmon, Michael R. Fong, and Mella J. Rothwell	Historic Properties Survey Report for Proposed Widening and Improvements to Highway 101 Between Highways 280/680 and Trimble Road/De La Cruz Avenue, City of San Jose, Santa Clara County, California	Basin Research Associates, Inc.	
S-010154	Voided - S-009205; Voided - S-009538	1988	Rebecca Loveland Anastasio, Donna M. Garaventa, Stuart A. Guedon, Robert M. Harmon, and Mella J. Rothwell	Historic Property Survey of the Proposed Central Expressway Commuter Lane Project Located in the Cities of Santa Clara, Sunnyvale, and Mountain View in Santa Clara County, California	Basin Research Associates, Inc.	43-000030, 43-000046, 43-000047, 43-000048, 43-000049, 43-000705, 43-000706, 43-000707, 43-000708, 43-000710, 43-000711, 43-000712, 43-000713, 43-000714, 43-000715, 43-000716, 43-000717

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
S-010154a		1987	Rebecca Loveland Anastasio, Donna M. Garaventa, Stuart A. Guedon, Robert M. Harmon, and Mella J. Rothwell	Historic Property Survey of the Proposed Central Expressway Commuter Lane Project Located in the Cities of Santa Clara, Sunnyvale, and Mountain View in Santa Clara County, California	Basin Research Associates, Inc.	
S-010154b		1987	Rebecca Loveland Anastasio, Donna M. Garaventa, Stuart A. Guedon, Robert M. Harmon, and Mella J. Rothwell	Historic Property Survey of the Proposed Central Expressway Commuter Lane Project Located in the Cities of Santa Clara, Sunnyvale, and Mountain View in Santa Clara County, California	Basin Research Associates, Inc.	
S-014230	IC Record Search Nbr - 60800-92-62	1992	Robert Cartier, Allika Ruby, Jason Bass, and Mike Kelley	Evaluation of Archaeological Resources for the San Jose/Santa Clara Nonpotable Water Reclamation Project	Archaeological Resource Management	43-000026, 43-000027, 43-000057, 43-000058, 43-000318, 43-000349, 43-000423, 43-000448, 43-000451, 43-000473, 43-000529, 43-000554, 43-000561, 43-000564, 43-000576, 43-000588, 43-000614, 43-000623
S-014599	Voided - S-14883	1992	Donna M. Garaventa, Steven J. Rossa, Melody E. Tannam, and Deborah M. DiPasqua	Cultural Resources Assessment for the San Jose International Airport Runway 12R/30L Expansion Project EIR, City of San Jose, Santa Clara County, California	Basin Research Associates, Inc.	
S-014599a		1992	James C. Bard	Completion of Archaeological Monitoring, Runway Expansion, San Jose International Airport (SJIA) (letter report)	Basin Research Associates, Inc.	
S-015935	IC Record Search Nbr - 60800-93-161	1993	Robert Cartier	Cultural Resource Evaluation of the De La Cruz Boulevard Project in the City of Santa Clara, County of Santa Clara	Archaeological Resource Management	
S-018377	IC Record Search Nbr - 60800-95-299	1996	Robert Cartier, Lynne Eckert, Jeanne Goetz, and Jon Reddington	Cultural Resource Evaluation of the Santa Clara Pipe Alignment for the South Bay Water Recycling Project	Archaeological Resource Management	
S-019072	Voided - S-18541; Voided - S-23080	1996	Colin I. Busby, Donna M. Garaventa, Melody E. Tannam, and Stuart A. Guedon	Historic Properties Treatment Plan, South Bay Water Recycling Program.	Basin Research Associates, Inc.	43-000024, 43-000057, 43-000217, 43-000423, 43-000529, 43-000966
S-019072a		1996	Colin I. Busby, Donna M. Garaventa, Melody E. Tannam, and Stuart A. Guedon	Supplemental Report: Historic Properties Affected or Potentially Affected by the South Bay Water Recycling Program	Basin Research Associates, Inc.	

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S-019072b		1999	Colin I. Busby	South Bay Water Recycling Program - Cultural Resources Program, Subcontract No. 728106.3024, Monitoring Closure Report - Phase 1 (letter report)	Basin Research Associates, Inc.	
S-020327		1998	Mark G. Hylkema	Extended Phase I Archaeological Survey Report, Subsurface Presence/Absence Testing at the Woolen Mills Chinatown Site (CA-SCL-807H) and Three Storm Water Detention Basins, for the Route 87 Guadalupe Corridor Freeway Project, City of San Jose, Santa Clara County, California: 04-SCL-87 PM 6.3/9.4, 04-SCL-101 PM	California Department of Transportation, District 4	43-000990
S-022819		2000	Wendy J. Nelson, Maureen Carpenter, and Julia G. Costello	Cultural Resources Survey for the Level (3) Communications Long Haul Fiber Optics Project, Segment WS05: San Jose to San Luis Obispo	Far Western Anthropological Research Group, Inc.; Foothill Resources, Ltd.	27-001191, 27-001219, 27-001243, 27-001889, 27-002242, 27-002322, 35-000024, 35-000036, 35-000111, 43-000106, 43-000109, 43-000141, 43-000455, 43-000573, 43-000575, 43-001071
S-022948		2000	Miley Paul Holman	Archaeological Backhoe Trenching of the Exodus Property, Santa Clara, Santa Clara County, California (letter report)	Holman & Associates	
S-023087		1999	Stuart Guedon	Archaeological Monitoring Closure Report, Westside Interim Long-Term and Employee Parking Lot (Airport Master Plan Update, Phase 1, Project T-1), San Jose International Airport, City of San Jose, Santa Clara County, California	Basin Research Associates, Inc.	
S-023934		2001		Cultural Resources Investigations for XO California, Inc. Fiber Optic Installations in San Francisco and Santa Clara Counties	Jones & Stokes	
S-025173	Submitter - 347-20	2002	John Holson, Cordelia Sutch, and Stephanie Pau	Cultural Resources Report for San Jose Local Loops, Level 3 Fiber Optics Project in Santa Clara and Alameda Counties, California	Pacific Legacy, Inc.; William Self Associates, Inc.	43-000019, 43-000026, 43-000058, 43-000141, 43-000308, 43-000369, 43-000382, 43-000387, 43-000398, 43-000423, 43-000433, 43-000444, 43-000448, 43-000451, 43-000473, 43-000476, 43-000479, 43-000530, 43-000565, 43-000623, 43-000624, 43-000709, 43-000925, 43-001013, 43-001024, 43-001056, 43-001071, 43-001102

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S-025327		2002	John A. Nadolski and Michelle St. Clair	Archaeological Investigations for the 650 Walsh Avenue, Santa Clara Wireless Communications Site, CA 2261D	Pacific Legacy, Inc.	
S-027280		2003	Jeff Rosenthal and Richard T. Fitzgerald	Subsurface Archaeological Survey Along the Guadalupe River and Phase 1.5 Test Excavation at CA-SCL-828 as Part of the Guadalupe Parkway Reevaluation, San Jose, California: EA 4874G1, 4-SCL-101 K.P. 63.3/66.0	Far Western Anthropological Research Group, Inc.; Caltrans	43-001163
S-030599		2004		Archaeological Monitoring Report, Improvement of Runway 30L Extension - 2004 (Airport Master Plan Update), Norman Y. Mineta San Jose International Airport, City of San Jose, Santa Clara County, California	Basin Research Associates, Inc.	
S-030858		2005	Carolyn Losee	New Tower ("NT") Submission Packet, FCC Form 620, Paragon Mechanical, SJ-026-01	Archaeological Resources Technology	43-001731
S-033061	Submitter - SWCA Cultural Resources Report Database No. 06-507; Submitter - SWCA Report No. 10715-	2006	Nancy Sikes, Cindy Arrington, Bryon Bass, Chris Corey, Kevin Hunt, Steve O'Neil, Catherine Pruet, Tony Sawyer, Michael Tuma, Leslie Wagner, and Alex Wesson	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project, State of California	SWCA Environmental Consultants	01-000027, 01-000040, 01-000087, 01-000088, 01-000089, 01-000090, 07-000138, 27-000802, 27-001191, 27-001207, 28-000467, 43-000106, 43-000141, 43-000449, 43-000573, 43-000575, 43-000754, 43-000928, 43-001071, 48-000208, 48-000211, 48-000214, 48-000441, 48-000549, 49-001583, 57-000194, 57-000198, 57-000297, 57-000301, 57-000307
S-033061a		2006		Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project, State of California	SWCA Environmental Consultants	
S-033061b		2007	Nancy E. Sikes	Final Report of Monitoring and Findings for the Qwest Network Construction Project (letter report)	SWCA Environmental Consultants	
S-034231		2006	Colin I. Busby	Renzel Airfield Improvements (2005), Taxiway "Y", "Z", and NC Storm Sewer Improvements - Norman Y. Mineta San Jose International Airport, City of San Jose, Santa Clara County, California, Archaeological Monitoring Closure Report (letter report)	Basin Research Associates, Inc.	

Report List

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S-035004		2008	Miley Holman and Ian Alexander	A Report of Findings from Mechanical Subsurface Archaeological Testing of the Santa Clara 535 Reed Street Project Area, Santa Clara, Santa Clara County, California	Holman & Associates	
S-036715	Submitter - Project 07-SCAO-092.3	2009		Historic Property Survey Report/Finding of Effect, South Bay Water Recycling (SBWR) Stimulus Projects, Santa Clara Industrial 1, City of Santa Clara, Santa Clara County	Basin Research Associates, Inc.	
S-036717		2009		Historic Property Survey Report/Finding of Effect, South Bay Water Recycling (SBWR) Stimulus Projects, Santa Clara Industrial 2, City of Santa Clara, Santa Clara County	Basin Research Associates	
S-038425	Submitter - Project Number CNU3755	2001	Lorna Billat	Collocation Submission Packet, Paragon Mechanical, CNU3755, 2460 De La Cruz Blvd. Santa Clara City and County	EarthTouch, Inc.	43-001731
S-040756	Caltrans - EA 04-234-26470K	2012	Philip Kajjankoski, Jack Meyer, and Julia Costello	Extended Phase 1 Subsurface Archaeological Explorations for the US 101/ De La Cruz Boulevard/Trimble Road Interchange Improvement Project, San Jose, Santa Clara County, California; 04-SCL-101 PM 40.5/41.5, EA 04-234-26470K	Far Western Anthropological Research Group; Foothill Resources, Ltd.	43-000649
S-040756a		2012	Philip Kajjankoski	Historical Resources Compliance Report for the US 101/De La Cruz Boulevard/Trimble Road Interchange Improvement Project, San Jose, Santa Clara County, California, 04-SCL-101 PM 40.5/41.5, EA 04-234-26470K	Far Western Anthropological Research Group, Inc.	
S-045670	Caltrans - EA 2G7100; Caltrans - Project No. 0412000459; OHP PRN - FHWA 2014 0527 001	2014	Kathleen Kubal	Historic Property Survey Report, US 101 Express Lanes Project, Santa Clara County, California, Project No. 0412000459/EA 2G7100, 04-SCL-101 PM 16.00/52.55, 04-SCL-85 PM 23.0/24.1	URS Corporation	43-000032, 43-000040, 43-000072, 43-000175, 43-000181, 43-000183, 43-000189, 43-000247, 43-000250, 43-000251, 43-000252, 43-000339, 43-000345, 43-000415, 43-000416, 43-000441, 43-000560, 43-000568, 43-001001, 43-001095, 43-001163, 43-001473
S-045670a		2014	Kathleen Kubal	Supplemental Historic Property Survey Report, US 101 Express Lanes Project, Project No. 0412000459/EA 2G7100, 04-SCL-101 PM 16.00/52.55 - 04-SCL-85 PM 23.0/24.1, Santa Clara County, California	URS Corporation	

Report List

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S-045670b		2014	Nancy E. Sikes, Molly Valasik, Amy Glover, Jay Rehor, and Kathleen Kubal	Archaeological Survey Report, US 101 Express Lanes Project, Project No. 0412000459/EA 2G7100, US 101 PM 16.00/52.55 - SR 85 PM 23.0/R24.1, Santa Clara County, California	Cogstone Resource Management, Inc.; URS Corporation	
S-045670c		2014	Jay Rehor	Extended Phase I Study, US 101 Express Lanes Project, Project No. 0412000459/EA 2G7100, US 101 PM 16.00/52.55 - SR 85 PM 23.0/R24.1, Santa Clara County, California	URS Corporation	
S-045670d		2014	Karin G. Beck	Historical Resources Evaluation Report, US 101 Express Lanes Project, Project No. 0412000459/EA 2G7100, US 101 PM 16.00-52.55, SR 85 PM 23.0-24.1, Santa Clara County, California	URS Corporation	
S-045670e		2014	Carol Roland-Nawi	FHWA 2014 0527 001 Determinations of Eligibility for the Proposed US 101 Express Lanes Project, Santa Clara County, California	California Office of Historic Preservation	
S-046600	Submitter - CA-DGP048A	2015	Lorna Billat	New Tower ("NT") Submission Packet, FCC Form 620, Silicon Valley Power, CA-DGP048A	EarthTouch Inc.	43-003529
S-046600a		2015	Dana Supernowicz	Architectural Evaluation Study of the Silicon Valley Power Project, DGP Development Site No. DGP048A, 815 Comstock Street, Santa Clara County, California	Historic Resource Associates	
S-048099		2016	Sunshine Psota	Results of Archaeological Monitoring and Presence/Absence Trenching for SF-1 Data Center Addendum at 555 Reed Street in Santa Clara, Santa Clara County (letter report)	Holman & Associates	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
S-048738		2011	Denise Jurich and Amber Grady	California High-Speed Train Project, Environmental Impact Report/Environmental Impact Statement, Draft: San Francisco to San Jose Section, Archaeological Survey Report, Technical Report	PBS&J	38-000015, 38-004638, 38-005487, 38-005488, 41-000009, 41-000105, 41-000230, 41-000231, 41-000281, 41-000310, 41-000311, 41-000465, 41-000491, 41-000497, 41-000498, 41-000506, 41-001350, 41-001351, 41-001541, 41-001582, 41-002116, 41-002147, 41-002160, 41-002395, 41-002396, 41-002397, 41-002398, 41-002399, 41-002400, 41-002401, 41-002402, 41-002488, 41-002489, 41-002490, 41-002491, 41-002492, 41-002493, 41-002494, 41-002495, 41-002496, 41-002497, 41-002498, 41-002499, 41-002500, 41-002501, 41-002502, 41-002503, 41-002504, 41-002505, 41-002506, 41-002507, 41-002508, 41-002509, 41-002510, 41-002511, 41-002512, 41-002513, 41-002514, 41-002515, 41-002516, 41-002517, 41-002518, 41-002519, 41-002520, 41-002521, 41-002522, 41-002523, 41-002524, 41-002525, 41-002526, 41-002527, 41-002528, 41-002529, 41-002530, 41-002531, 41-002532, 41-002533, 41-002534, 41-002535, 41-002536, 41-002537, 41-002538, 41-002539, 41-002540, 41-002541, 41-002542, 41-002543, 41-002544, 41-002545, 41-002546, 41-002547, 41-002548, 41-002549, 41-002550, 41-002551, 43-000021, 43-000028, 43-000042, 43-000050, 43-000595, 43-000619, 43-000669, 43-002193, 43-003137, 43-003172, 43-003475, 43-003477, 43-003577, 43-003690, 43-003691, 43-003692, 43-003693, 43-003694, 43-003695, 43-003696, 43-003697, 43-003698, 43-003699, 43-003700, 43-003701, 43-003702, 43-003703, 43-003704, 43-003705, 43-003706, 43-003707, 43-003708, 43-003709, 43-003710, 43-003711, 43-003712, 43-003713, 43-003714, 43-003715, 43-003716, 43-003717, 43-003718, 43-003719,

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
S-048738a		2011	Amber Grady and Richard Brandi	California High-Speed Train Project Environmental Impact Report/Environmental Impact Statement, Draft: San Francisco to San Jose Section Historic Architectural Survey Report, Technical Report	PBS&J	43-003721, 43-003722