

DOCKETED

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2021_06_15 comments for the Great Oaks Backup Generating Facility DRAFT EIR

If interested please see attached comments in pdf form.

Additional submitted attachment is included below.

A. THANKS CALIFORNIA ENERGY COMMISSION STAFF for the DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) of the Great Oaks South Data Backup Generating Facility. Thanks especially for:

1. FOR THE EDUCATION: The information seems relevant to the many data center projects proposed and existing in the Santa Clara county/San Jose area. It is obvious many different people, with different professional perspectives, examined the project. Different perspectives might provide more peace to a diverse public audience. EIR redundancies first seemed annoying, but with progress through the 524 pages, made learning easier. Taking the time to read and review this, seemed well worth the time and effort. {I helped as a graphic artist with technical reports for EIRs in a previous position, but had never read an EIR previously.} I encourage many to read if possible. The last sections provided unexpected and valuable information. Obviously, California Energy Commission (CEC) staff thoroughly examined many issues, wrote professionally and generously to explain issues and concepts to more general audiences. That is not an easy task. Thanks for this difficult yet extremely useful work.
2. FOR DETAILING HEALTH RISKS DUE TO POLLUTION TYPES (pp. 103-106/524)
3. FOR DATA on how many times data center backup emergency generators have been used in the local area and details on 2020 emergency use (p. 464-469/524).
4. FOR ALTERNATIVES in detail (Section 5).
5. FOR MITIGATION MEASURES, including nitrogen deposition fees (pp. 373, 431-433, 437, 443, Appendix C/524) and \$300/tree to Our City Forest (pp. 20, 68,167, 181/524).
6. FOR EXPLAINING DIFFERENCES between renewable diesel and biodiesel (pp 432-4, 436, 496/524). I might have hoped renewable diesel could be made on site, but must not be possible. If this is possible, I suggest that be detailed too.
7. DIMENSIONS of proposed generators and above ground diesel storage tanks (pp 349, 507/524).
8. FOR BICYCLE AND PEDESTRIAN PROMOTION, DETAILS and IMPROVEMENTS (many pages).
9. FOR INCLUDING A NOISE CONTROL “DISTURBANCE COORDINATOR” contact to nearby residents, businesses and presumably workers (p. 35, 74, 316, 319/524).

10. FOR AMBIENT NOISE RULES and notes of typical 55 decibel residential rules (p. 314/524) It might prove thoughtful to more remember less/zero noise is likely biologically healthier and realize low volume “white noise” adds a layer of industrialism.
11. FOR RULE 5, PAGE 453: to not allow the data center emergency generation to be used for other areas. This might prevent near-future diesel virtual power plant (diesel-VPP) existence before clean fuel replacement is possible.
12. **EXTREME THANKS TO THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT:** for new December 21, 2020 diesel emergency standby power guidelines re: any new and open permit with emergency generators of 1000 backup horsepower to meet U.S. EPA Tier 4 emission standards (p 431/524).

B. QUESTIONS **Personal, from a public viewer – not a staff member. NOT to be taken overly seriously. I do not consider myself an expert.****:**

1. How can a project have “in-lieu of the installed ADA ramps ... “ (p. 344/524)? Ramps per Americans with Disabilities Act (ADA) rules can help a multitude of others, such as mothers with baby carriages, temporarily disabled persons, injured persons, young children on bicycles and elderly with carts.
2. How does a 6-mile radius indicate a “cumulative” air quality assessment (p. 106/524), when pollution can travel? Visibly wildfire smoke travels to distant different parts of the state (according to broadcast television weather reports). Also, despite low generator emissions, if there is a lot of smoke – no matter what vicinity the smoke is generated, adding another pollutant could make a more extreme health hazard.
3. Information to perhaps resolve for the final EIR:
 - a. distance to closest residence 650-710 feet
 - b. diesel tank size 8500-9600 gallons
 - c. direction to international airport being northwest (p. 126/524) rather than south (p.278/524)

C. SUGGESTIONS **Personal, from a public viewer – not a staff member. NOT to be taken overly seriously. I do not consider myself an expert.****:**

1. NEWER DIESEL PARTICULATE MATTER DATA: I understand the written concept that areas change per past trends and, for example, increased diesel, for example, will be expected to remain consistent (p. 397/524). However, diesel data from 2012 might not be as relevant in 2021 as one might hope. Cumulative pollution, no matter what areas are compared, could reach a maximum threshold which do not support life well for various biology genera. I would encourage obtaining new diesel data as part of this project's analysis.
2. SOCIAL MEDIA NOTIFICATION/LINGUISTIC ISOLATION: The idea that this area is impacted by language barriers (pp. 385, 387, 392/524), might be significant. I commend the CEC for reaching out to the nearby residents, more so than required. I also believe that EIR's or other governing laws requiring projects to contact residents might need to update to include social media. Social media can make a broad broadcast quickly. Many people in distant 'language-origin' areas can contribute to understanding and discussion.
3. SOLAR: With 18 acres, it seems unusual that designers and developers not consider more photovoltaic generation and want to more goal independent buildings (p. 266, 272/524).
4. POLITICAL WEIGHT: Can political weight of the San Jose Clean Energy (SJCE) Community Choice Aggregate (CCA) system be explained (p. 259, 355/524)? In this project, it seems the San Jose's City Council hosts the SJCE CCA. Their combined motives may aim to eventually separate PG&E local utility responsibilities where more independence might eventually occur. The project might have been designed to help deal with Public Safety Power Shutoff (PSPS) events (p. 460/524). This project might also be designed to test modern diesel machines. {Is there data on how many operational employees work the data center versus the number of operational employees who test and maintain on-site emergency backup generation regularly (p. 64/524)?} While CCA progress occurs, residents might be more vulnerable to their city's project decisions and "emergency" definitions more than in the past.
5. REQUIRE GREY WATER DESIGN (if not with this project, soon): Though joining the South Bay Water Recycling Program is considered not feasible (p. 354/524), making certain site water is reused in landscaping or building design is probably a wise step for California.
6. ADD CLAUSE: In 2020, substantial emergency data center diesel generation hours were allowed (p.465/524). Emergency diesel generation might eventually circumvent CEC jurisdiction entirely due to the current CEC Small Power Plant

Exemption processes. I would hope the CEC would propose a clause for reintegrating authority over small power plants if they become problematic, e.g., appear to be operating in unison in one area. If many diesel generators deploy during an accepted emergency event, the area could experience a worse noise and/or respiratory emergency per wildfire smoke and diesel particulate matter/compounds.

7. **NON-RETALIATION EDUCATION:** In providing a disturbance coordinator service (pp. 35, 74, 315, 317/524), parties might want to consider educating involved persons on non-retaliation attitudes/behaviors for complaints and reporting. When a large developer and many construction workers are mad at one or a few persons, possibly of less income and status, who dare(s) to complain which possibly halts or slows a project, the person(s)'s situation, life and/or future health might become jeopardized. It seems increasingly difficult to prove events are related to complaints due to privacy issues. One cannot assume confidential services remain confidential either, per my own experiences.

D. IS IT POSSIBLE TO:

1. Please explain what happens to available diesel during an emergency (p. 377/524). Despite what diesel is stored, if there is an emergency, many want this fuel and might easily deplete resources rapidly.
2. Please explain how reasonable (or not) it is to believe that renewable diesel can be produced on a scale to satisfy the needs of new data centers in the near future. (p. 434-5/524). Can new diesel projects be made to source/fund this cleaner fuel need?
3. The EIR lacks electromagnetic fields (EMF) analysis. EMF analysis in California and other densely occupied areas seems long overdue. EMF may contribute to health problems, biological damage, sabotage/cyber events, and possibly contribute to global warming and wildfire spread. (A good resource to learn about "electrosmog" is "The Electronic Silent Spring" book by Katie Singer, 2014.) I realize the CEC is NOT tasked with creating new EIR categories, but if CEC leaders could start mentioning this missing section to appropriate parties/stakeholders/agencies/other leaders, it might be highly considerate. Similarly, thanks for mentioning and analyzing thermal plumes which might cause aviation disturbances (p 349/524). Invisible fields and invisible heat can obviously cause issues in ways that make people suspect unnatural unscientific causes.