

**DOCKETED**

<b>Docket Number:</b>	21-SPPE-02
<b>Project Title:</b>	STACK Trade Zone Park
<b>TN #:</b>	243848
<b>Document Title:</b>	Claire A Warshaw Comments - 21-SPPE-02_NOP Stack Trade Zone Park_Draft Env Impact Report & Agency Request for Participation
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Claire A. Warshaw
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	7/6/2022 12:56:48 PM
<b>Docketed Date:</b>	7/6/2022

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Submitted On: 7/6/2022  
Docket Number: 21-SPPE-02*

**21-SPPE-02\_NOP Stack Trade Zone Park\_Draft Env Impact Report  
& Agency Request for Participation**

*Additional submitted attachment is included below.*

I endorse the California Energy Commission's (CEC's) "Notice of Preparation of the Draft Environmental Impact Report (EIR) and Agency Request for Participation."

EIRs seem highly educating for many people. In this "Stack Trade Zone Park" SPPE, 21-SPPE-02, I appreciate the applicant's foresight in providing improved design beforehand, the CEC staff's large data request sent already, plus the applicant's data request speedy response. Prior SPPE process intervenor participation, public participation, applicant and CEC staff work has seemingly influenced Data Center owners in designing improvements for this CEC SPPE project, which originally specifies Tier 4 diesel restrictions and language that the project cannot supply power to the grid, for example. This seems a usual and healthy design evolution process.

Additionally, I ask staff to consider additional noise research and note other "food for thought" concerns below:

This project specifies what appears to potentially be an extremely noisy chiller system, plus backup diesel generation which can also be unusual in sound. I am concerned not only for existing project neighbors and businesses, but also potentially for building occupants and workers. Noisy machinery seems particularly difficult to mitigate well.

1. "Understanding Noise Exposure Limits: Occupational vs. General Environmental Noise", Centers for Disease Control and Prevention (CDC) website, "NIOSH Science Blog," Posted February 8, 2016, by Chuck Kardous, MS, PE; Christa L. Themann, MA, CCC-A; Thais C. Morata, Ph.D. and W. Gregory Lotz, Ph.D. <https://blogs.cdc.gov/niosh-science-blog/2016/02/08/noise/>

"... In 1998, NIOSH established the REL for occupational noise exposures to be 85 decibels, A-weighted (dB[A]) as an 8-hour time-weighted average. Exposures at or above this level are considered hazardous...."

for four hours. Alternatively, for every 3-dB decrease in noise level, the exposure time is doubled, as shown in the table below.

Average Sound Exposure Levels Needed to Reach the  
Maximum Allowable Daily Dose of 100%

Time to reach 100% noise dose	Exposure level per NIOSH REL
8 hours	85 dB(A)
4 hours	88 dB(A)
2 hours	91 dB(A)
60 minutes	94 dB(A)
30 minutes	97 dB(A)
15 minutes	100 dB(A)

2. U.S. Environmental Protection Agency, "Clean Air Act Title IV - Noise Pollution," authors not listed (as of July 6<sup>th</sup>, 2022, near 11 am PT) <https://www.epa.gov/clean-air-act-overview/clean-air-act-title-iv-noise-pollution>,

"Noise pollution adversely affects the lives of millions of people. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference,

*California Energy Commission's "Notice of Preparation of a Draft Environmental Impact Report and Agency Request for Participation," "Stack Trade Zone Park, 21-SPPE-02," Public Comment, July 6, 2022, submitted by Claire A. Warshaw*

hearing loss, sleep disruption, and lost productivity. Noise Induced Hearing Loss (NIHL) is the most common and often discussed health effect, but research has shown that exposure to constant or high levels of noise can cause countless adverse health affects.”

NOTE: I might question SPPE data center projects due to their author’s concepts of new critical assets and emergencies, as well as cumulative impacts if there actually was a significant area emergency and emissions that might flow to other neighboring valleys. I am not certain if there is an authority that could step in later if SPPE approved projects in one region, are later reconfigured into a Virtual Power Plant (VPP).

Furthermore, I question the use of diesel, though notably I am not a diesel expert. I notice diesel exhaust seemingly faster than other exhaust types especially when bicycling and walking. Diesel exhaust can be overwhelming. I understand diesel emissions are significant respiratory public health hazards. I greatly appreciate filters and vastly improved machinery if this fuel is to be utilized. I understand renewable diesel, which suggests less emissions, is not readily available at large quantities yet.

I had heard that diesel availability is impacted during emergencies. If true, diesel might be considered a limiting energy resource during long time period emergencies, potentially such as a large earthquake, which could impact diesel’s value for an emergency backup system of many data centers in one area.