AVAIO Pittsburg Backup Generating Facility

Initial Study/Mitigated Negative Declaration

CALIFORNIA
ENERGY
COMMISSION
Gavin Newsom,
Governor

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Initial Study/

Mitigated Negative Declaration

AVAIO Pittsburg Backup Generating Facility

(24-SPPE-01)

Lead Agency

California Energy Commission

October 2025

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Section 1

Mitigated Negative Declaration

MITIGATED NEGATIVE DECLARATION

AVAIO Pittsburg Backup Generating Facility
Docket Number: 24-SPPE-01

1.0 Mitigated Negative Declaration

1.1 Project Description

Project: AVAIO Pittsburg Backup Generating Facility
2232 Golf Club Road
Pittsburg, CA 94565

Applicant: AVAIO Digital Partners I, LLC,
LLC 107 Elm St – Suite 501
Stamford, CT 06902

AVAIO Digital Partners I (AVAIO or applicant) is proposing to construct and operate the Pittsburg Data Hub (PDH) located in the city of Pittsburg. The PDH's main component will be a three-story approximately 347,740 square foot data center building, a substation, a Pacific Gas and Electric Company (PG&E) switching station and transmission lines, the Pittsburg Backup Generating Facility (PBGF), site access and surface parking, landscaping, stormwater controls and features, and water and sewer pipeline interconnections. PBGF would be an emergency backup generating facility with a generation capacity of up to 92 megawatts (MW) to support the need for the PDH to provide uninterruptible power supply for its tenants' servers. The PBGF would consist of thirty-seven (37) 3 MW diesel-fired backup generators arranged in a generation yard located on the west side of the PDH. Thirty-six (36) of the generators would be dedicated to replacing the electricity needs of the data center in case of a loss of utility power, and one (1) of the generators would be used to support general office loads along with building and life safety services (house generator).

The California Energy Commission (CEC) is responsible for reviewing, and ultimately approving or denying, all thermal electric power plants, 50 megawatts (MW) and greater, proposed for construction in California. The Small Power Plant Exemption (SPPE) process allows applicants with generating facilities between 50 and 100 MW to obtain an exemption from the CEC's jurisdiction and proceed with local approval rather than requiring certification by the CEC. AVAIO filed an

application on February 29, 2024, requesting an SPPE for the PBGF. The CEC can grant an exemption if it finds that the proposed facility would not create a substantial adverse impact on the environment or energy resources. Section 25519(c) of the Public Resources Code designates the CEC as the California Environmental Quality Act (CEQA) lead agency, as provided in section 21165 of the Public Resources Code, for all projects that receive an exemption from the CEC's power plant certification process.

1.2 Introduction

Pursuant to the California Environmental Quality Act (CEQA), the CEC staff has prepared an Initial Study (IS) for the proposed project to determine if any significant adverse effects on the environment would result from project implementation. The IS utilizes the environmental checklist outlined in Appendix G of the CEQA Guidelines. If an IS for a project indicates that a significant adverse impact could occur, a public agency shall prepare an Environmental Impact Report.

According to Article 6 (Negative Declaration Process) and Section 15070 (Decision to Prepare a Negative Declaration or Mitigated Negative Declaration) of the CEQA Guidelines, a public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

a) *The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or*

b) *The initial study identifies potentially significant effects, but:*

   1) *Revisions in the project plans or proposals made by, or agreed to by, the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*

   2) *There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.*

1.3 Environmental Determination

The IS was prepared to identify the potential environmental effects resulting from proposed project implementation, and to evaluate the level of significance of these effects. The IS is based on information from the applicant's SPPE application including revised project description and associated submittals, data requests and responses, and additional staff research.

Based on the analysis in the IS, it has been determined that all project-related environmental impacts could be reduced to a less than significant level with the incorporation of feasible mitigation measures. See the respective technical area for the full text of the mitigation measures.

Therefore, adoption of a Mitigated Negative Declaration (MND) would satisfy the requirements of CEQA. The project's mitigation measures included are designed to reduce or eliminate the potentially significant environmental impacts. Mitigation measures are structured in accordance with the criteria in Section 15370 of the CEQA Guidelines.

Section 2

Introduction

2.0 Introduction

2.1 Small Power Plant Exemption (SPPE)

Pittsburg Data Hub, LLC, a wholly owned subsidiary of AVAIO Digital Partners I, LLC (AVAIO or applicant) is seeking a Small Power Plant Exemption (SPPE) from the California Energy Commission (CEC) for the Pittsburg Backup Generating Facility (PBGF). The CEC has the exclusive authority to certify all thermal power plants (50 megawatts [MW] and greater), and related facilities proposed for construction in California. The SPPE process allows applicants with facilities not exceeding 100 MW to obtain an exemption from CEC's jurisdiction and proceed with local permitting rather than requiring the CEC's certification. The CEC can grant an exemption if it finds that the proposed facility would not create a substantial impact on the environment or energy resources.

Public Resources Code section 25519(c) designates the CEC as the lead agency, in accordance with California Environmental Quality Act (CEQA), for all facilities seeking an SPPE. As the lead agency pursuant to CEQA, the CEC is responsible for the preparation of this Initial Study. The CEC will use this Initial Study in support of its discretionary decision to grant or deny the small power plant exemption application. Per CEQA Guidelines Section 15070 (Cal. Code Regs., tit. 14, § 15070), a negative declaration or mitigated negative declaration shall be prepared for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

  (1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

  (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

If the exemption is granted, the Initial Study/Mitigated Negative Declaration is expected to be used by the city of Pittsburg in its consideration of permitting the project as well as by the Bay Area Air Quality Management District for its issuance of various air quality permits. Upon exempting the project, the CEC would have no permitting authority over the project and would not be responsible for any mitigation or permit conditions imposed by the city of Pittsburg or other agencies.

2.2 CEQA Project Definition

According to CEQA Guidelines Section 15378 (Cal. Code Regs., tit. 14, § 15378), a "project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

1. An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.
2. An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
3. An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

The term "project" refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term "project" does not mean each separate governmental approval (Cal. Code Regs., tit. 14, § 15378(c)).

The CEC SPPE's determination is limited to the PBGF for the proposed AVAIO Pittsburg Data Hub (PDH). Nonetheless, this initial study evaluates the whole PDH project including the PBGF (construction and operation) to inform the public and decision makers on the potential environmental impacts of the whole action.

2.3 Organization of this Initial Study

The environmental analysis of this SPPE takes the form of an Initial Study (IS), which was prepared to conform to the requirements of CEQA (Pub. Resources Code, § 21000 et seq.), the CEQA Guidelines (Cal. Code Regs, tit. 14, § 15000 et. seq.), and the CEC's regulations and policies. The IS is based on information from the applicant's SPPE application and associated submittals, site visits, data requests and responses, and additional staff research and agency consultation.

This IS evaluates the potential environmental impacts that might reasonably be anticipated to result from the construction and operation of the project. Staff's analysis is broken down into issue areas derived from Appendix G to the CEQA Guidelines:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Land Use and Planning
- Mineral Resources
- Noise

- Biological Resources
- Cultural and Tribal Resources
- Energy
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

In addition, CEC's CEQA analysis documents include an analysis of Environmental Justice. For each subject area, the analysis includes a description of the existing conditions and setting related to the subject area, an analysis of the proposed project's potential environmental impacts, and a discussion of mitigation measures, if necessary, to reduce potentially significant impacts to less than significant levels.

Section 3

Initial Study

3.0 Initial Study

3.1 Project Title

AVAIO Pittsburg Backup Generating Facility (24-SPPE-01)

3.2 Lead Agency Name and Address

California Energy Commission
715 P Street
Sacramento, California 95814

3.3 Lead Agency Contact Person and Phone Number

Ali Jahani, Project Manager
Siting, Transmission, and Environmental Protection Division
California Energy Commission
(279) 226-1175

3.4 Project Sponsor's Name and Address

AVAIO Digital Partners I, LLC
107 Elm St – Suite 501
Stamford, CT 06902

3.5 General Plan Designation

The project site has a City of Pittsburg 2040 General Plan land use designation of "Employment Center Industrial" (ECI) (City of Pittsburg 2024a, 2024b, 2024c).

3.6 Zoning

The City of Pittsburg zoning designation for the project site is Planned Development (PD), and the project site is located within the Pittsburg Technology Park Specific Plan. (City of Pittsburg 2024a, 2024b, 2024c).

3.7 Project Location and Surrounding Land Uses

The project site is located at 2232 Golf Club Road, Pittsburg, California. The proposed AVAIO Pittsburg Data Hub (PDH or project), which includes the Pittsburg Backup Generating Facility (PBGF), would be located within Contra Costa County on an approximately 22.31-acre site (DayZenLLC 2024). Figure 3-1 is a Regional Vicinity Map and Figure 3-2 is a Preliminary Site Plan.

The 22.31-acre PDH site currently includes two parcels: APNs 095-160-001 and 095-160-002 (DayZenLLC 2024). However, the applicant has submitted a Vesting Tentative Subdivision Map for the PDH (DayZenLLC 2025a, 2025b). Once the map is approved

and recorded by the City of Pittsburg, the proposed data center and backup generating facility would be located on a single parcel that is 764,308 square feet (DayZenLLC 2025a, 2025b).

The PDH would be constructed within a portion of the former municipal Delta View Golf Course, a 175-acre property that permanently closed in 2018. The former Delta View Golf Course is located within a larger 420-acre property that is known as the Stoneman Property (City of Pittsburg 2025). **Table 3-1** identifies the land uses that surround the project site.

TABLE 3-1 LAND USES SURROUNDING PROJECT SITE

Direction	Land Use	Location
Northwest	Residences	Located along Golf Club Road, with the nearest residence west of and adjacent to the project site's northernmost end
	Church of Jesus Christ of Latter-Day Saints	Located at 2201 Golf Club Road, west of and adjacent to the project site's northernmost end
	Rancho Medanos Junior High School	Located at 2301 Range Road, approximately 0.1 mile northwest of the project site
North	Delta de Anza Regional Trail	Approximately 100 feet north of the project site
East	PG&E transmission right-of-way	Adjacent to the project site along the east side of the project
	Residences	East of the PG&E right-of-way, approximately 0.15 mile east of the project site
Southeast	Pittsburg Water Treatment Plant	Located at 300 Olympia Drive, approximately 0.2 mile southeast of the project site
South	Contra Costa Canal	Adjacent to the project site's southernmost end
	Former Delta View Golf Course	South of the Contra Costa Canal
Southwest	Diablo Valley Radio Controllers Airfield	Located within the Stoneman Property and accessible via John Henry Johnson Parkway. Approximately 0.85 mile southwest of the project site
	Hiking and mountain biking trails	Located within the Stoneman Property and accessible via John Henry Johnson Parkway. Approximately 0.25 mile southwest of the project site at their nearest point
	Picnic shelter	Located within the Stoneman Property and accessible via John Henry Johnson Parkway. Approximately 0.4 mile southwest of the project site
West	Former Delta View Golf Course	Adjacent to the project site along the west side of the project

AVAIO Pittsburg Backup Generating Facility Project Site

Figure 3-1
Regional Vicinity and Land Use Map

Source: CEC Staff

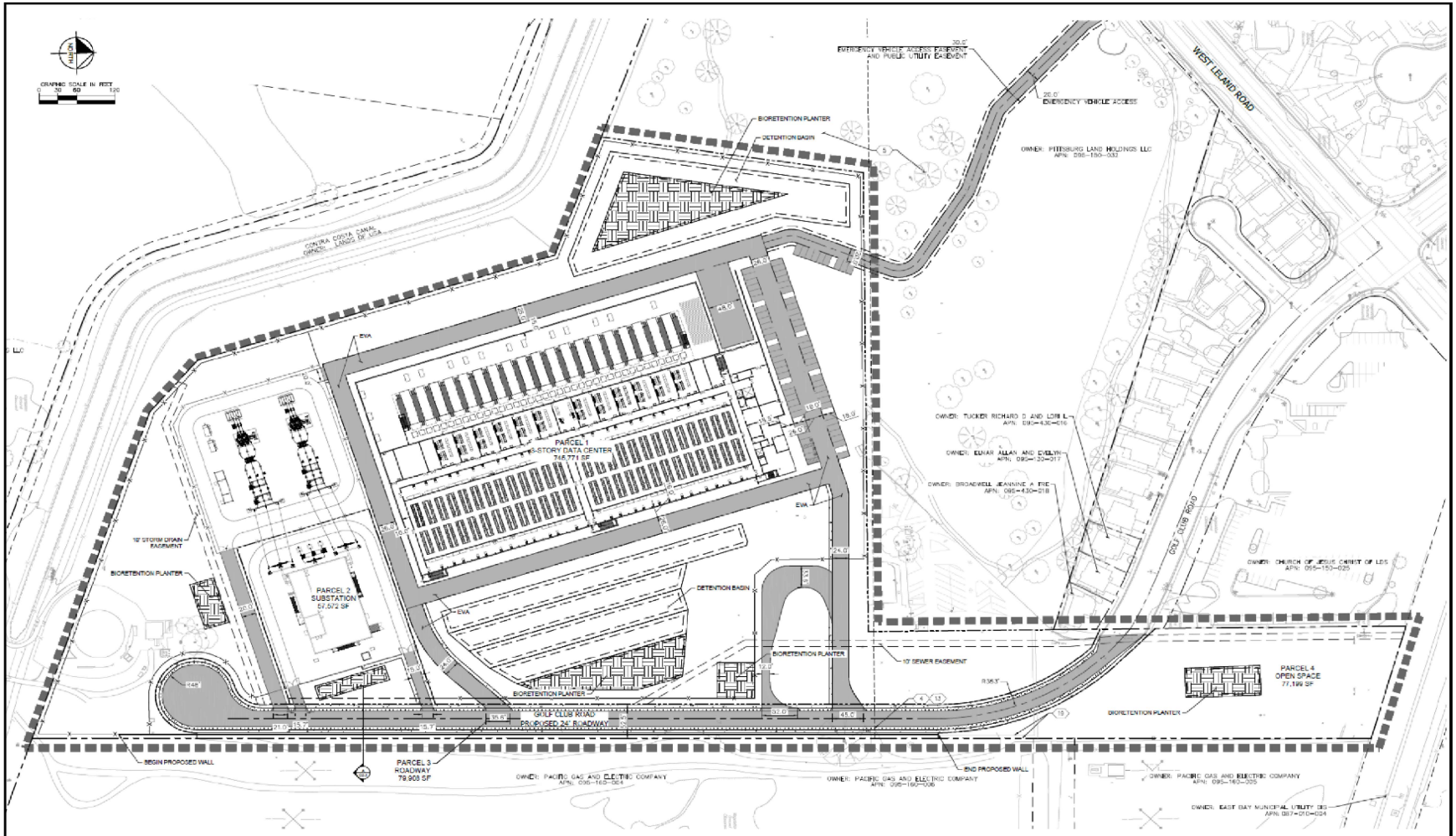

Figure 3-2
Preliminary Site Plan

Sources: DayZen LLC, 2023

3.8 Project Description

The following project description is from the Pittsburg Backup Generating Facility's (PBGF) Project Description - Part I of IV, dated February 28, 2024 (DayZen 2024).

Pittsburg Data Hub Site Description

The site is currently part of the abandoned Delta View Golf Course. Golf course uses ceased in 2018. The only structures on site include a water storage tank and an associated one-story building located in the southeastern corner of the site. These structures would remain on site. Other golf course buildings that were located near the northeastern corner of the site were demolished by the City prior to AVAIO's acquisition of the land, although associated foundations and concrete slabs remain. The project's main and secondary entrance to the site would be located off of the extension of Golf Club Road at the northeastern corner of the property. An additional emergency entrance would be located in the northwest corner of the property via an easement which would connect with West Leland Road.

Site vegetation consists of mustard seed and other weeds for most of the abandoned fairways, greens, beaches and ponds. Trees throughout the site are in varying degrees of decline or overgrowth, and are generally species that would not be recommended for the climate. Fire damage and water deprivation have caused distress and death to a good portion of the trees on site. The project proposes to demolish the existing shrubs, groundcovers, and trees on the site, and plant new groundcover, shrubs, and trees that are coordinated with the design, drought tolerant, and suitable for the site.

Property is irregularly shaped and is generally bound to the north by West Leland Road and existing residential development, to the east by an existing PG&E transmission easement, and to the south and west by the Contra Costa Canal. The area to the north and east of the project site consists primarily of residential land uses. The area to the south and west of the project site consists of the remainder of the abandoned golf course. The nearest residence is located to the north approximately 400 feet from the project boundary.

PDH Facilities Description

Overview

The Commission SPPE's determination is limited to solely to the PBGF. However, in order for the Commission to inform the decision-makers of the potential environmental effects of the PBGF, in combination with the PDH, AVAIO has included a complete description of the PDH. The components of the PDH would include:

- A three-story approximately 347,740 square foot data center building;
- A Project Substation;

- A PG&E Switching Station and Transmission Lines;
- The PBGF;
- Site Access and Surface Parking;
- Landscaping;
- Stormwater Controls and Features; and
- Water and Sewer Pipeline Interconnections.

Data Center Building

The PDH project's main component would be a three-story 347,740 square foot data center building would house computer servers for private clients in a secure and environmentally controlled structure and would be designed to provide 60 megawatts (MW) of power to information technology (Critical IT) equipment. Appendix A includes the Preliminary Architectural, Civil, Mechanical, Electrical and Landscaping Plans and Elevation Drawings. The data center building would consist of two main components; the data center suites that would house client servers, and the administrative facilities including support facilities such as the building lobby, restrooms, conference rooms, landlord office space, customer office space, loading dock and storage. The data center suite components would consist of three levels of data center space. Each level would contain two (2) data center suites and corresponding electrical/UPS rooms. The data center is being designed with an average rack power rating of 10 kW. The data center is expected to have between 20 and 30 employees and 12-15 visitors (including deliveries) visit the site per day.

Massing, Heights and Setbacks

The three-story data hall building is composed of admin, data hall, and loading dock masses. The admin portion, located on the North side of the building, is clad with curtain wall and metal panel systems. The data hall portion is clad primarily in precast concrete panels and/or EIFS. The top of the parapet at the admin and data hall is at 81 feet. Two exterior stairs located on the SE corner and in the eastern facade of the building are semi enclosed with cladding to match that of the main datacenter block. A rooftop dunnage platform is provided at 85 feet for mechanical equipment. A sound attenuating screen topping off at 94 feet fully encloses the platform. Access to the platform is provided by a freight elevator and a staircase on the NW corner of the building. The top of the elevator parapet is at 105 feet. The building would be located in the center of the site, orientating its longer axis in a NW-SE angle, and would be set back at a minimum of 400 feet from the nearest residential property to the north, a minimum of 90 feet from the electrical yard to the west (adjacent to a non-residential zone), a minimum of 180 feet from the eastern facade to the east (adjacent to Golf Club Road), and a minimum of 320 feet from the south facade to the south (adjacent to a non-residential zone).

Cooling Technology

Air cooled chillers are used to get rid of the heat generated in the data center. They are sized to be able to carry the full heat load under without any water requirement. The units also have an optional "adiabatic precooling system". When used in this way, water is sprayed onto the chiller coils, reducing the electric power needed for the compressor and fans significantly. For this operation, recycled water would be utilized. However, due to water quality required by the manufacturer, water filtration is required to ensure water quality is maintained at the chillers. Both the data halls and office areas also require humidification. Although far less than the precoolers noted above, these systems also use water and would be connected to the same water filtration system. There is little discharge from either the precooling or humidification systems; however the filtration system requires approximately 25% of incoming water to be drained as part of the (reverse-osmosis) processing. Conditioned air would cool the IT equipment rejecting heat to Hot Aisle Containment (HAC) and then migrates into the return air plenum above the ceiling. The heat above the ceiling would be drawn back to the gallery and conditioned by the fan wall units before being distributed back to the data hall. The ability to provide chilled water to the IT racks would be available for high-density loads. The office and storage areas would be conditioned via variable air volume (VAV) systems consisting of Roof Top Units (RTUs) connected to interior VAV boxes.

Project Substation

The project would construct a new 100 MVA (mega volt-ampere) electrical substation adjacent to the north side of the data center building project station) as Shown on Figure TX-101 in Appendix A. The two-bay project substation (two 100 MVA 230 kV-34.5kV step-down transformers and primary distribution switchgear) would be designed to allow one of the two transformers to be taken out of service, effectively providing 100 MVA of total power (a 2-to-make-1 design). The project substation would have an all-weather drivable surface. An eight foot high chain like fence would surround 3-sides of the substation with the 4th common with the PG&E switching station enclosure material. An oil containment pit surrounding each transformer would capture unintended oil leaks. Access to the substation would be from a separate entrance from the public right-of-way on Golf Club Road. The project substation would be capable of delivering electricity to the PDC from PG&E's new adjacent on site Switching Station but would not allow any electricity generated from the PBGF to be delivered to the transmission grid. Availability of project substation control systems would be ensured through a redundant DC battery backup system. The project substation would use (2)245kV, 40kA rated SF6 gas insulated high voltage breakers. These would be procured in 2025 and arrive onsite prior to the January 1, 2027 CARB phase-out date for this class of GIE.

PG&E Switching Station and Transmission Lines

To serve the PDH, PG&E would be constructing a "looped" transmission interconnection to the existing Pittsburg-Eastshore 230 kV Transmission Line involving two overhead

transmission line extensions from the PG&E Switching Station to two new steel monopoles installed within the existing PG&E right of way and that would replace one existing steel lattice tower as shown on Figure TX-101 in Appendix A. PG&E's Switching Station would be constructed adjacent to the project substation and would be built in a Breaker and a Half (BAAH) configuration. This would consist of 2 incoming 230kV circuits entering a BAAH configuration consisting of 6 230kV circuit breakers, steel structures, 230kV switches, metering devices, and a non-occupied control enclosure. The PG&E Switching Station would have crushed rock surface with an aggregate base. A 12ft high ballistic rated metal panel wall would surround all 4 sides of the switchyard. Access to the PG&E Switching Station would be from a separate entrance from the public right-of-way on Golf Club Road. Availability of the Switching Station control systems would be ensured through a redundant DC battery backup system A preliminary one-line diagram for the PG&E Switching Station is provided in Appendix A, as Figure E1.20. The PG&E Switching Station would use 245kV, 63kA rated Gas-Insulated Switchgear (GIS) with internal high voltage breakers. This would be procured in 2025 and arrive onsite prior to the January 1, 2031 CARB phase-out date for this class of GIE.

PBGF Description

Overview of Proposed PBGF

PBGF would be an emergency backup generating facility with a generation capacity of up to 92 MW to support the need for the PDH to provide uninterruptible power supply for its tenants' servers. The PBGF would consist of thirty-seven (37) 3-MW diesel-fired backup generators arranged in a generation yard located on the west side of the PDH. Thirty-six (36) of the generators would be dedicated to replace the electricity needs of the data center in case of a loss of utility power, and one of the generators would be used to support general office loads along with building and life safety services (house generator).

General Site Arrangement and Layout

The 37 emergency backup generators (36 for the data center suites and one for the house load) would be located at the site in a generation yard adjacent to the west side of the PDH building. Figures 3-4, 3-5, and 3-3 show the Campus, Building, and Site Plans of the PBGF within the PDH site. The generation yard would be electrically connected to the PDH building through above ground or in trenched cable bus to a location within the building that houses electrical distribution equipment.

Generating Capacity

Overview

In order to determine the generating capacity of the PBGF, it is important to consider and incorporate the following critical and determinative facts.

1. The PBGF uses internal combustion engines and not turbines.
2. The PBGF internal combustion engines have a peak rating and a continuous rating.
3. The PBGF through software technology and electronic devices is controlled exclusively by the PDH.
4. The PBGF has been designed with a distributed redundant system.
5. There would be a total of six redundant data center generators.
6. There would be a total of one house generator to provide electricity during emergencies to support portions of the admin building and features necessary for emergency response.
7. The PBGF would only be operated for maintenance, testing and during emergency utility power outages and would not operate for any demand response program.
8. The PBGF would only operate at a load equal to the demand of the PDH during an emergency utility outage.
9. The PBGF would only be interconnected to the PDH and would not be interconnected to the transmission or distribution grid.

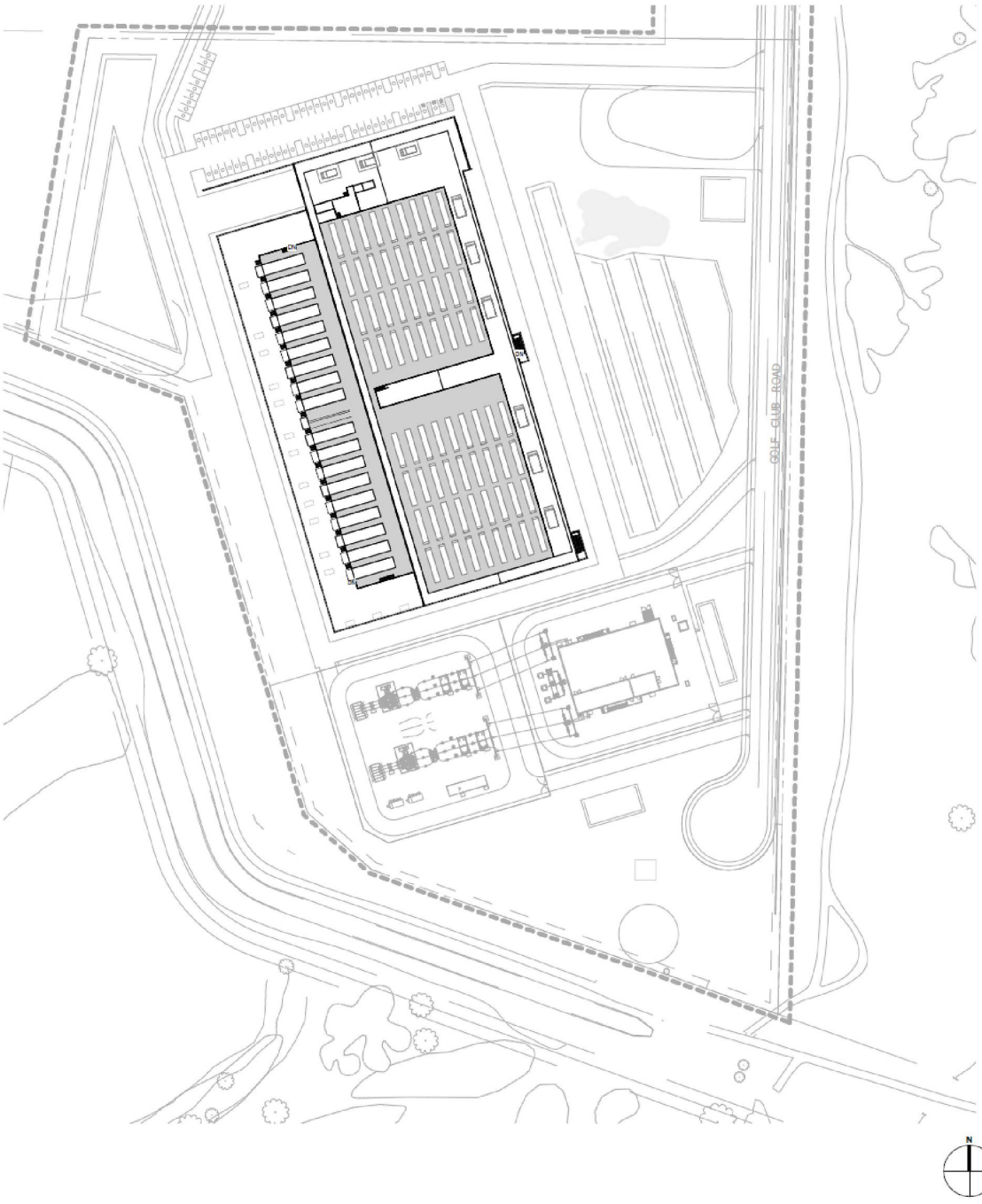

Figure 3-3
Campus Site Plan

Sources: DayZen LLC, 2023

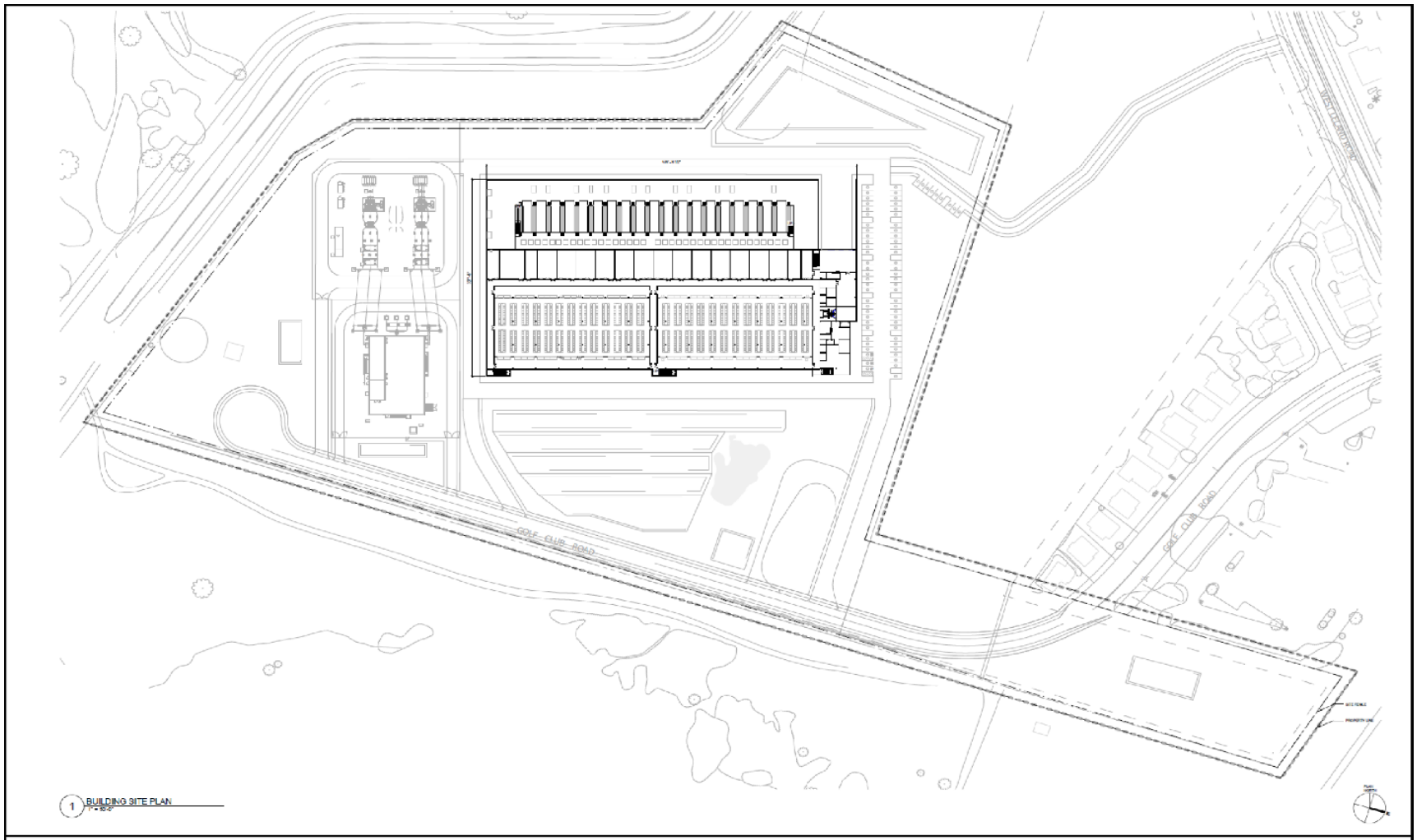

Figure 3-4
Building Site Plan

Sources: DayZen LLC, 2023

Generating Capacity and Power Utilization Efficiency

The CEC has determined the maximum generating capacity of a backup generating facility is the maximum capacity of the load being served. The design demand of the PDH, which the PBGF has been designed to reliably supply with redundant components during an emergency, is based on the maximum critical IT load and maximum mechanical cooling electrical load occurring during the hottest hour in the last 20 years. Such conditions are possible but extremely unlikely to ever occur. The PDH load on that worst-case day would be 92 MW. It is important to understand that while the PDH would be designed to accommodate the full IT equipment load of the building, it is AVAIO's experience that the customers that lease data center space do not utilize the entire load identified in their lease. This typically results in data center demand loads approximately 85-90 percent. Therefore, a fully leased 60 MW data center would only be expected to reach a demand load around 54 MW.

The data center industry utilizes a factor called the Power Utilization Efficiency (PUE) to estimate the efficiency of its data centers. The PUE is calculated by dividing the total demand of the data center infrastructure serving the critical IT spaces (including IT load) by the Critical IT load itself. The theoretical peak PUE for the Worst Day Calculation would be 1.51 (Total 92 MW demand of Building on Worst Case Day divided by 60.0 MW Total Critical IT Load). The average annual PUE at full load would be 1.17 (Total 71.4 MW demand of Building average conditions divided by 60.0 MW Design Critical IT Load). These PUE estimates are based on design assumptions and represent worst case. As described above, the expected PUE is much lower because the Critical IT that is leased by clients is rarely fully utilized. AVAIO team members' experience with operation of other data centers is that the actual annualized PUE would be closer to 1.17.

Backup Electrical System Design

Overview

There would be six data center suites in the PDH. Each data center suite would be designed to handle 10 MW of IT equipment load. The total maximum load of each data center suite would be 15 MW which includes the IT equipment load, mechanical equipment to cool the IT equipment load, lighting and data center monitoring equipment. The sum of the six center suites would result in 60 MW of IT equipment load and 90 of total electrical load.

There are 36 electrical lineups supporting the data center suites. Each backup electrical system has been designed to serve the suites in groups. Each redundant system of six 3 MW generators serves a single data center suite. Each group of 6 generator redundant system is designed for one generator to be taken out of service at any moment in time (called "6 to make 5").

During a utility outage, all 6 generators would start and carry load up to approximately 80 percent of their nameplate rating supporting the suite they serve. If one of the generators fails or needs to be taken out of service during the emergency, the 6 to make 5 design allows the failing generator to be removed from operation automatically with the remaining 5 generators to continue to serve the lineups up to the maximum design load of the data center suite.

Each redundant backup generation system is made up of 6 "capacity groups" with each electrical capacity group sized at 3 MW (3000 kW) of total power. An electrical capacity group consists of one 3000 kW generator, one 3,360 kVA 34.5kV-480V medium voltage transformer, one 4,000 ampere 480-volt service switchboard and a 2,000-kW uninterruptible power supply (UPS) system.

The IT equipment would have dual cords that would take power from two different capacity groups. The dual cords are designed to evenly draw power from both cords when power is available on both cords, and automatically draw all of its power from a single cord when power becomes un-available on the other cord. Each of the 6-to-make-5 electrical systems would be designed to continue supporting all of the IT equipment load in the data center suite it serves any time one of the six capacity groups is either scheduled to be out-of-service for maintenance or becomes un-available due to equipment failure. Therefore, the 18 MW of total power equipment capacity installed for each 6-to-make-5 system effectively provides only 15 MW of total power.

The electrical load on each electrical capacity group is monitored by the building automation system. When any of the electrical capacity groups reach 72 percent loaded (based on 90 percent of the 80 percent maximum loading under normal operation), an alarm is activated in the engineering office. The operations staff would work with the tenants to ensure that the facility power levels are not exceeded. The consequence of electrical capacity groups exceeding 80 percent load could lead to dropping IT equipment when coupled with a capacity group failure event. If all the capacity groups serving a data center suite (six capacity groups) are loaded over 80 percent and an electrical capacity group fails, the resulting load transferring to the five available capacity group would exceed the rating of the capacity groups and would lead to overcurrent protection devices tripping open due to the overload condition. Therefore, it is vital to the reliability of the data center to make sure that all capacity groups remain below the 80 percent threshold.

Generator System Description

Each of the 37 generators would be Cummins Model C3000 D6e standby emergency diesel fired generators equipped with Selective Catalytic Reduction (SCR) equipment and diesel particulate filters (DPF) to comply with Tier 4 emissions standards. The maximum peak generating capacity of each generator is 3 MW for standby applications (short duration operation). Under normal operation with all when all generators are

active, the maximum load on each generator is designed to be 80 percent of the peak capacity. Manufacturer specification sheets and performance data for the proposed generators are provided in Appendix B. Each individual generator would be provided with its own package system. Within that package, the prime mover and alternator would be automatically turned on and off by a Programmable Logic Controller (PLC) located in the 480-volt main switchboard located within the PDH, programmed to manage utility-to-generator power transfer. Each generator would be controlled by a separate, independent transfer controller. The generator would be turned on if the electrical utility power becomes unavailable and would be turned off after utility power has been restored and the transfer controller has returned the utility to the active source of power serving the computer and mechanical loads within the PDH.

The generator package would integrate an SCR and Diesel Exhaust Fluid (DEF) tank. The generators would be constructed in a stacked configuration as shown in Figure 3-5. The bottom generators would be placed on a concrete slab and the upper generators would be supported on a raised structural steel platform. The generators enclosures are approximately 14 feet wide, 56 feet long and 24 feet high. Generators would have stack heights approximately 60 feet above ground level. Each pair of generators would be spaced approximately seven feet apart horizontally. The west end of the generator yard would be partially enclosed with a 60 foot high perforated metal screen to obscure views of the generators.

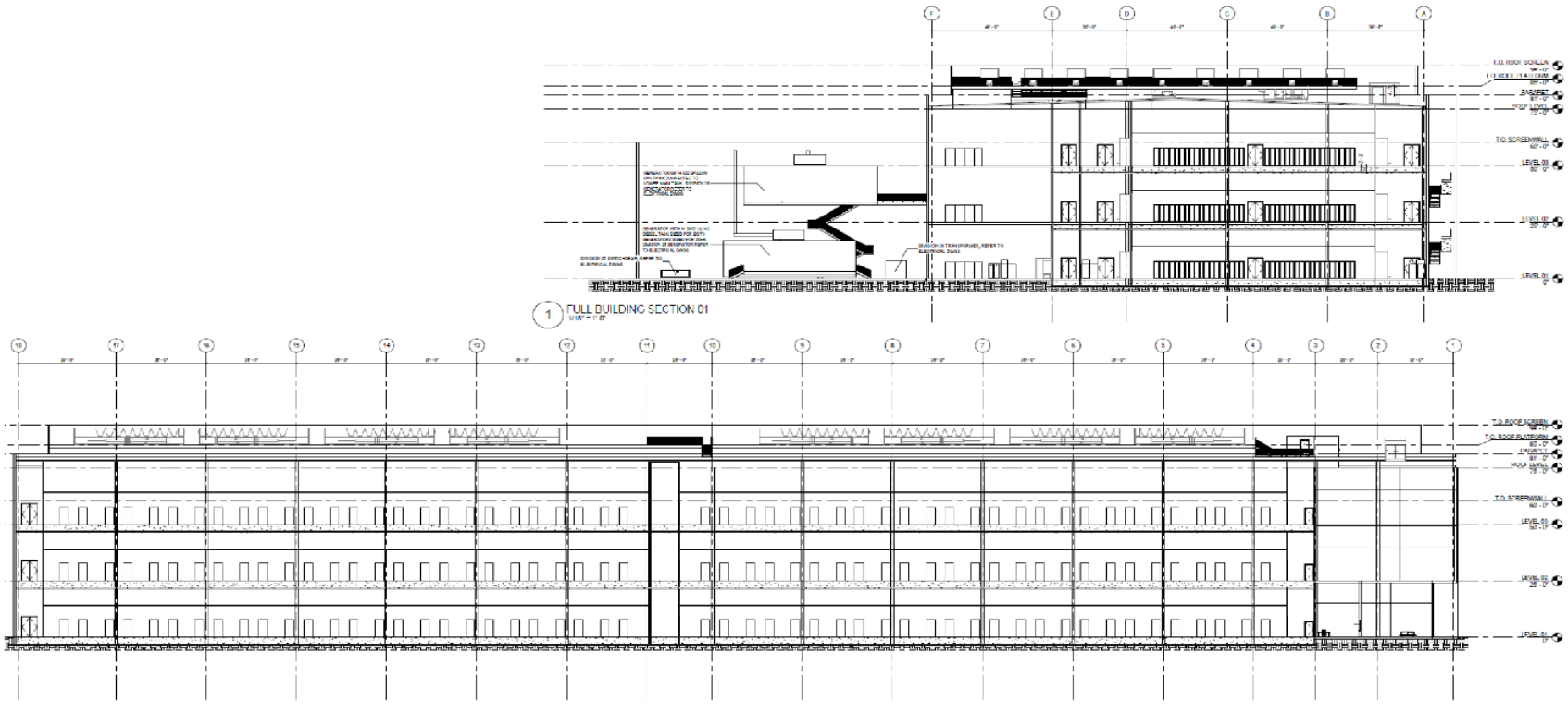

Figure 3-5
Full Building Sections

Sources: DayZen LLC, 2023

Fuel System

The backup generators would use renewable diesel as its primary fuel when feasible and ultra-low sulfur diesel as fuel (less than 15 parts per million sulfur by weight) when renewable diesel is not readily available. The bottom generator of each stacked pair would have an approximately 10,400-gallon diesel fuel storage tank to serve both of the generators. The upper generator in the stacked configuration would have a day tank with a storage capacity of approximately 500 gallons. Approximately 9,700 gallons for a stacked pair of generators are required for 24-hour operation. The generators would have a combined diesel fuel storage capacity of approximately 368,600 gallons, which is sufficient to provide more than 24 hours of emergency generation at full electrical worst case demand of the PDH.

Cooling System

Each generator would be air cooled independently as part of its integrated package and therefore there is no common cooling system for the PBGF.

Water Supply and Use

The PBGF would not require any consumption of water.

Grading and construction of the PDH is estimated to utilize 1.75 acre feet of water over the 18 month construction period.

The PDH uses air cooled chillers for cooling needs of the data center. An adiabatic system has been added as an option to reduce compressor use based on weather conditions. **Tables 3-2** through **3-4** present the water and sewer demand for the site.

TABLE 3-2 PROPOSED DOMESTIC WATER DEMAND

Description of Land Use	**Domestic Water Demand**		
Land Use	Average Daily Demand (gpd)	Average Yearly Demand (gpy)	Average Yearly Demand (AFY)
FTE Indoor Demand	196	71,176	0.22
Total Demand	**196**	**71,176**	**0.22**

TABLE 3-3 PROPOSED RECYCLED WATER DEMAND

Description of Land Use	**Recycled Water Demand**		
Land Use	Average Daily Demand (gpd)	Average Yearly Demand (gpy)	Average Yearly Demand (AFY)
Administrative HVAC	19	7,094	0.02
Data Halls	41,177	15,029,638	46.15
FTE Indoor Demand	201	73,502	0.23
Irrigation Demand	17,010	6,208,744	19.07
Total Demand	58,407	21,318,978	65.47

TABLE 3-4 PROPOSED SEWER DEMAND		
Description of Land Use	**Sewer Demand**	
Land Use	Average Daily Demand (gpd)	Average Yearly Demand (gpy)
Administrative HVAC	10	3,582
Data Halls	10,236	3,736,286
FTE Indoor Demand	201	73,502
Total Demand	10,447	3,813,370

Waste Management

The PBGF would not create any waste materials other than minor amounts of solid waste created during construction and maintenance activities.

Hazardous Materials Management

The PDH would prepare a Spill Prevention, Control and Countermeasure Plan (SPCC) to address the storage, use and delivery of diesel fuel for the generators. Each generator unit and its integrated fuel tanks have been designed with double walls. The interstitial space between the walls of each tank is continuously monitored electronically for the existence of liquids. Additionally, the standby generator units are housed within a self-sheltering enclosure that prevents the intrusion of storm water. Diesel fuel would be delivered on an as-needed basis in a compartmentalized tanker truck with maximum capacity of ~17,500 gallons. The tanker truck parks on the access road to the south of the generator yard and extends the fuel fill hose through one of multiple hinged openings in the precast screen wall surrounding the generator equipment yard or via a centralized fueling station with located on the exterior of the precast screen wall. There are no loading/unloading racks or containment for re-fueling events; however, a spill catch basin is located at each fill port for the generators. To prevent a release from entering the storm drain system, storm drains would be temporarily blocked off by the truck driver and/or facility staff during fueling events. Rubber pads or similar devices would be kept in the generation yard to allow quick blockage of the storm sewer drains during fueling events. To further minimize the potential for diesel fuel to come into contact with stormwater, to the extent feasible, fueling operations would be scheduled at times when storm events are improbable. Warning signs and/or wheel chocks would be used in the loading and/or unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed transfer lines. An emergency pump shut-off would be utilized if a pump hose breaks while fueling the tanks. Tanker truck loading and unloading procedures would be posted at the loading and unloading areas. Diesel Exhaust Fluid (DEF) is used as part of the diesel engine combustion process to meet the emissions requirements. Each enclosure would have a 550 gallon DEF gallon tank. Dosing is addressed at each generator within the enclosure.

Site Access and Parking

The overall project site would include one primary entrance from Golf Club Road extension located in the southeastern corner of the site. A secondary emergency entrance would be located in northwestern corner of the site and would connect via easement to West Leland Road. The project would provide a total of 70 parking spaces on site. Sixty-six (66) would be standard spaces, and within those 66, one would be equipped for EV charging, ten would be Electric Vehicle (EV) capable spaces, and one would be EV capable and set up for conversion to being accessible. Of the remaining four stalls, all are accessible, two are van accessible and one of the van accessible stalls would also be equipped for EV charging. The proposed parking plan conforms to City Code and CalGreen Standards.

Landscaping

This project proposes to remove 25 protected trees and 17 dead trees on-site due to various conflicts with proposed civil, architectural, and various site improvements. The City of Pittsburg's landscape ordinance mandates a 4:1 tree replacement ratio with 24-in box trees, for protected trees only.

New landscaping consisting of trees, large and medium shrubs, and groundcovers would be installed along the property boundaries, building perimeters, stormwater treatment facilities, and landscape beds distributed throughout the parking facilities. Trees would be planted five feet away from new or existing water mains or utility lines. The new landscape would include drought tolerant native and non-native trees, shrubs, and groundcovers. New planting would also be tolerant of recycled water. The landscape design would meet the State and City Water Efficient Landscape Ordinance (WELO) requirements for water use. We estimate that the new planting would be approximately 15 percent under the landscape Maximum Water Use for the site as calculated with the WELO formulas.

Stormwater Controls and Features

The San Francisco Bay Regional Water Quality Control Board (RWQCB) has issued the Municipal Regional Stormwater NPDES Permit (MRP) to regulate stormwater discharges from municipalities and local agencies. Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 10,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g. rainwater harvesting for non-potable uses). Examples of C.3 LID measures include bioretention areas, flowthrough planters, and subsurface infiltration systems. The PDH proposes to construct stormwater treatment areas consisting of LID (Low-Impact Development) bioretention areas and at-grade flow-through planter boxes totaling approximately

31,000 square feet, based on preliminary impervious calculations, sized according to the requirements of the MRP. The stormwater treatment areas would be located around the perimeter of the site, and adjacent to paved parking areas and building. In the existing condition, stormwater discharges the site at two locations, one storm drain lateral located at the north end of the site, and secondly by overland flow from the low point of the site to the parcel to the east. The existing lateral located at the north end of the site would be reused. Given the extension of Golf Club Road, overland discharge from the site cannot be maintained and would be improved with a culvert undercrossing the proposed roadway to transmit flows to the east and match existing hydrology. Downspouts for the roof drainage would connect to storm drains that would route flows either into drainage swales leading to bioretention or directly into bioretention planters. Surface drainage of hardscape such as asphalt drive aisles and parking would be routed to curb cuts and drainage swales that would discharge to bioretention, or into inlets and pipes directly to bioretention.

Flow-through planters and bioretention planters would include perforated underdrains and overflow structures that connect to the on-site storm drains systems.

Utility Interconnections

As part of the construction of the new building, domestic water, recycled water, fire water, sanitary sewer, and fiber connections would be made.

Domestic Water Infrastructure

The site is served by an existing 6” water main on Golf Club Road which is not adequately sized to serve the proposed development. Rather than upsize the existing main in Golf Club Road and interrupt existing residents and the church in the vicinity, the water main located within APN 095-150-032 is proposed to be extended directly to the project site for service. Laterals would provide water service for fire and potable water needs at the building.

Recycled Water Infrastructure

There is a municipal 30-inch existing water main on the project site that feeds a private 1 million gallon storage tank located at the site. The existing storage tank includes an air gap and has back-up connection to domestic water to provide reliable service. A recycled water lateral would be extended from the tank to provide irrigation service and cooling.

Sanitary Sewer Infrastructure

There is an 8-inch water main on the project site, which received flows from the 8-inch main on Golf Club Road and flows to the north, leaving the project site and continuing north. The project would extend the water main south within Golf Club Road and provide service to the project. A service lateral would connect from the proposed data center structure to sewer main within Golf Club Road. Because of existing grading

constraints, a portion of the proposed sewer main extension at the north would be offset from Golf Club Road in an easement to provide for cover and allow gravity service to be maintained, and at south end of Golf Club Road the sewer main would run directly under the Golf Club Roadway.

PHD Project Construction and Operation

Site grading, demolition, excavation, and construction is anticipated to begin in November 2025 through May 2027; a total of approximately 18 months. The peak construction workforce is approximately 150 workers per month with an average of approximately 100 workers per month.

The proposed site grading would involve cut and fill operations utilizing cut material as engineer fill. Based on preliminary grading designs, it is anticipated approximately 29,500 cubic yards of material would be exported from the site. Maximum cut depths are estimated to be 15 feet below existing grade in the western portion of the project site. As recommended in the preliminary geotechnical engineering report contained in Appendix E, the foundation system for the data center building be a cast in place aggregate pier system extending at least 10 feet into underlying formational material. Shallow foundations placed on engineered fill or stable underlying formational material may be used for ancillary support features. The maximum depth below existing grade for any of the drainage facilities (bioretention areas) is 15 feet below existing grade.

PBGF Project Construction

Construction activities for the PDH are expected to begin in 2025. Since the site preparation activities for the PDH would include the ground preparation and grading of the entire PDH site, the only construction activities for the PBGF would involve construction of the generation yard. This would include construction of concrete slabs, fencing, installation of underground and above ground conduit and electrical cabling to interconnect to the PDH Building switchgear, and placement and securing the generators.

The generators themselves would be assembled offsite and delivered to site by truck. Each generator would be placed within the generation yard by a crane. Construction of the generation yard and placement of the generators is expected to take six months and is included in the overall construction schedule for the PDH. Construction personnel for the PBGF are estimated to range from 10 to 15 workers including one crane operator.

PBGF Facility Operation

The backup generators would be run for short periods for testing and maintenance purposes and otherwise would not operate unless there is a disturbance or interruption of the utility supply. Bay Area Air Quality Management District's (BAAQMD) Authority to Construct and the California Air Resources Board's Airborne Toxic Control Measures

(ATCM) limits each engine to no more than 50 hours annually for reliability purposes (i.e., testing and maintenance). Maintenance and testing of each the of generators are anticipated to be once a month. Each generator would be tested individually during monthly and annual testing. Generators would only be run simultaneously during an emergency utility outage. For each generator testing and maintenance would not exceed 34 run hours per year.

3.9 Other Public Agencies Whose Approval is Required

- City of Pittsburg
- Bay Area Air Quality Management District

3.10 Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.31?

On December 18, 2023, the applicant's consultant, ECORP Consulting, Inc. (ECORP), sent letters via certified mail and email to the potentially interested tribes that were identified by the Native American Heritage Commission (NAHC) including:

- Amah Mutsun Tribal Band of Mission Indians San Juan Bautista
- Chicken Ranch Rancheria of Me-Wuk Indians
- Confederated Villages of Lisjan Nation
- Guidiville Rancheria of California
- Indian Canyon Mutsun Band of Costanoan
- Muwekma Ohlone Indian Tribe of the San Fransico Bay Area
- Nashville Enterprise Miwok-Madiu-Nishinam Tribe
- North Valley Yokuts Tribe
- The Ohlone Indian Tribe
- Wilton Rancheria

Andrew Galvan of the Ohlone Indian Tribe responded on December 18, 2023, and requested the results and list of contacts provided by the NAHC. ECORP responded and forwarded the results on December 19, 2023. On January 11, 2024, the Confederated Villages of Lisjan Nation responded requesting a copy of the records search results, EIR, and results of the sacred land file (SLF) search. ECORP replied with a copy of the SLF and record search results on January 15, 2024, and informed the Lisjan Nation that their request would be included in the cultural resources report and continued consultation would be under AB 52 conducted by the lead agency. ECORP has not received any other responses from the potentially interested tribes.

Additionally, consistent with the CEC's tribal consultation policy (CEC 2024), CEC staff contacted the NAHC on April 16, 2024, to request a search of the SLF and a list of California Native American tribes that might be interested in the proposed project. The Native American contacts list differed from the one sent to ECORP the previous year. The list included six additional tribes and excluded two:

- Buena Vista Rancheria of Me-Wuk Indians
- Calaveras Band of Me-Wuk Indians
- California Valley Miwok Tribe
- Chicken Ranch Rancheria of Me-Wuk Indians
- Confederated Villages of Lisjan Nation
- Guidiville Rancheria of California
- Ione Band of Miwok Indians
- Jackson Rancheria Band of Miwuk Indians
- Muwekma Ohlone Indian Tribe of the San Fransico Bay Area
- Nashville Enterprise Miwok-Madiu-Nishinam Tribe
- Northern Valley Yokut/Ohlone Tribe
- Pakan'yani Maidu of Strawberry Valley Rancheria
- The Ohlone Indian Tribe
- Wilton Rancheria

On December 11, 2024, the CEC sent formal consultation request letters via certified mail to the tribes identified by the NAHC. Vanesa Kremer of Wilton Rancheria responded by e-mail on January 13, 2025, confirming that the project is in Wilton's ancestral territory; however, they currently have no concerns with the project. The CEC responded back on January 13, 2025, stating that they will keep Wilton Rancheria updated if there are any changes to the project or if any cultural materials are encountered.

On January 23, 2025, e-mail copies of the letters were sent to the remaining tribes that had not yet responded. Additionally, on January 24, 2025, letters were e-mailed to the two tribes that did not appear on the CEC's contact list. On January 23, 2025, Buena Vista Rancheria of Me-Wuk Indians responded via e-mail informing the CEC about a change in leadership. On January 24, 2025, a representative of the Confederated Villages of Lisjan Nation responded via e-mail requesting consultation. They also asked for copies of all cultural reports, the records search results, and results of the SLF search. The CEC responded via e-mail on January 24, 2025, acknowledging their request to consult. On January 26, 2025, a representative of the Muwekma Ohlone Tribe of the San Francisco Bay Area e-mailed with interest in consultation and offering

monitoring services if needed. The CEC replied via e-mail on January 27, 2025, letting the tribe know we received and acknowledged their desire to consult. On January 27, 2025, a representative of the Northern Valley Yokut/Ohlone Tribe indicated it would like to consult and schedule a meeting to discuss the project. The CEC responded with an e-mail on January 30, 2025, acknowledging the tribe's desire to consult and requesting dates and times for a meeting. On January 27, 2025, a representative from the Amah Mutsun Tribal Band of San Juan Bautista indicated the tribe's interest in the project and provided recommendations. The CEC responded with an e-mail on January 30, 2025, acknowledging their interest in consulting on the project. Please refer to **Section 5.5, Cultural and Tribal Cultural Resources** for additional details regarding tribal consultation.

3.11 References

CEC 2024 – California Energy Commission (CEC). *Tribal Consultation Policy*. CEC-130-2024-001. Sacramento, CA, February 2024.

City of Pittsburg 2024a – City of Pittsburg (City of Pittsburg). City of Pittsburg City Council/Agency Concurrent Meeting Minutes. Dated May 6, 2024. Available online at: https://www.pittsburgca.gov/services/city-clerk/agendas-minutes

City of Pittsburg 2024b – City of Pittsburg (City of Pittsburg). City of Pittsburg City Council/Agency Concurrent Meeting Minutes. Dated November 4, 2024. Available online at: https://www.pittsburgca.gov/services/city-clerk/agendas-minutes

City of Pittsburg 2024c – City of Pittsburg (City of Pittsburg). Pittsburg 2040 General Plan. Adopted May 6, 2024. Available online at: https://www.pittsburgca.gov/services/community-development/planning/advanced-planning-special-projects/general-plan-update

City of Pittsburg 2024d – City of Pittsburg (City of Pittsburg). Pittsburg Technology Park Specific Plan. Adopted November 4, 2024. Available online at: https://www.pittsburgca.gov/services/community-development/planning/advanced-planning-special-projects/pittsburg-technology-park-specific-plan-project

City of Pittsburg 2025 – City of Pittsburg (City of Pittsburg). Engage Pittsburg Forum: Future Use of the 175 Acre Golf Course Footprint. Accessed on March 12, 2025. Available online at: https://communityfeedback.opengov.com/portals/pittsburgca/Issue_6153

DayZenLLC 2024 – DayZenLLC (DayZenLLC). TN 254728. Application for Small Power Plant Exemption Pittsburg Backup Generating Facility. Dated February 29, 2024. Available online at: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-SPPE-01

DayZenLLC 2025a – DayZenLLC (DayZenLLC). TN 261064. AVAIO Responses to CEC Data Request Set 2 – PBGF – Part I of II. Dated January 13, 2025. Available

online at: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-SPPE-01

DayZenLLC 2025b – DayZenLLC (DayZenLLC). TN 262829. AVAIO Supplemental Responses to CEC DR LU-2, TSD-4, and TSD-6 – PBGF. Dated April 28, 2025. Available online at: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-SPPE-01

DayZenLLC 2024 – DayZenLLC (DayZenLLC). TN 254728. Application for Small Power Plant Exemption Pittsburg Backup Generating Facility. Dated February 29, 2024. Available online at: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-SPPE-01

Section 4

Environmental Determination

4 Environmental Determination

4.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, with some involving at least one impact that is a "Potentially Significant Impact" and requiring implementation of mitigation as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture & Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural & Tribal Cultural Resources	☐ Energy & Energy Resources
☒ Geology & Soils	☒ Greenhouse Gas Emissions	☒ Hazards & Hazardous Materials
☒ Hydrology & Water Quality	☐ Land Use & Planning	☐ Mineral Resources
☐ Noise	☐ Population & Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Utilities & Service Systems
☐ Wildfire	☒ Mandatory Findings of Significance	

4.2 Environmental Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

☐ I find that the proposed project may have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An

ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Dian Vorters

Date: October 14, 2025

Dian Vorters, Deputy Director
Siting, Transmission and Environmental Protection Division
California Energy Commission

Section 5

CEQA Checklist