

**CALIFORNIA ENERGY COMMISSION**

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512



October 22, 2001

Mr. Doug Wheeler  
Vice President of Development  
GWF Energy LLC  
4300 Railroad Avenue  
Pittsburg, CA 94565

Dear Mr. Wheeler:

**HENRIETTA PEAKER PROJECT (01-AFC-18) DATA REQUESTS**

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission (Energy Commission) staff requests that GWF Energy LLC supply the information specified in the enclosed data requests.

The subject areas addressed in the enclosed data requests are air quality, biological resources, cultural resources, geology, land use, power plant efficiency, socioeconomics, soil and water resources, traffic and transportation, transmission systems engineering, worker safety/fire protection, and visual impacts. Other data requests may be submitted at a later date. The information requested is necessary to understand the project, assess whether the project will result in significant environmental effects, and to assess project alternatives and mitigation measures.

Written responses to the enclosed data requests are due to the Energy Commission by November 14, 2001, or at a later date agreed upon by the Energy Commission staff and the applicant.

If you are unable to provide the information requested in the data requests, or object to providing it, you must contact the committee assigned to the project and the project manager, within 10 days of receiving these requests, stating your reason for delay or objection.

If you have any questions regarding the enclosed data requests, please call me at (916) 651-8835.

Sincerely,

Bob Eller  
Siting Project Manager

Enclosure  
cc: Agency Distribution List

**Henrietta Peaker Project (01-AFC-18)**  
**Data Requests**

**Technical Area:** Air Quality

**Author:** William Walters and Lisa Blewitt

**BACKGROUND**

In the AFC, the temporary PM<sub>10</sub> impacts from construction appear to be potentially significant. Staff needs clarification of the construction emissions and modeling assumptions to be able to assess the Applicant's analysis. Additionally, the construction schedule requires additional description and clarification.

**DATA REQUEST**

1. The AFC notes a 20-hour per day schedule for the heavy equipment (Table 8.1-12, pg. 8.1-48 and Appendix B), while the AFC (Table 8.1-11, pg. 8.1-47) also indicates that construction will be limited to 12 hours per day. In section 2.2.15 (pg. 2-16) construction is noted to be limited to 12 hours per day (6 a.m. to 6 p.m.), and finally in section 8.5.4.3 (pg. 8.5-6) construction activities will be limited to 7 a.m. to 10 p.m. to the extent possible.
  - a. Please clarify the daily and hourly construction schedules. Also identify the anticipated construction schedule for the on-site and linear facilities, identifying overlaps in the monthly construction schedule.
  - b. Please provide corrected emission calculations if they are changed.
  - c. If the construction emissions modeling has incorporated hourly emission factors (i.e. temporal factors), please describe the methodology for incorporating these hourly adjustments.
  - d. Please remodel onsite construction emissions using appropriate hour of day emission factors, if necessary, based on the heavy equipment operating schedule and any corrected emission calculations.
2. The diesel equipment SO<sub>2</sub> emissions appear to be based on 0.25% (2500 ppm) sulfur fuel (AP-42). This sulfur content is five times the California Motor Vehicle Diesel Standard. Please correct the emissions calculations and modeling results to reflect the use of 0.05% (500 ppm) sulfur diesel.
3. The modeled exhaust velocity (40 m/s) and exhaust temperature (700°K or 800°F) appears to be higher for construction vehicles than would be reasonably expected. Additionally, the modeled stack diameter (0.05 meters) appears to be smaller than can be reasonably expected. Please provide documentation to confirm these values, or remodel using more appropriate values.
4. Please provide electronic copies of any new or revised construction modeling input/output files, including the additional modeling performed to support the information presented in the AFC Supplement (Table 8.1-18).

**Henrietta Peaker Project (01-AFC-18)**  
**Data Requests**

**BACKGROUND**

In the AFC, the applicant has concluded that the air quality impacts from project operation and commissioning will be insignificant. Staff needs clarification of specific technical issues to complete the review of the air quality impact analysis.

**DATA REQUEST**

5. Please describe each commissioning activity listed in the table on page 8.1-32. Include the following additional information:
  - a. Please provide fuel consumption data and load conditions for each commissioning event.
  - b. Please provide vendor data and calculations to support the commissioning emissions including stack parameters for each commissioning event.
  - c. Please provide a screening level modeling analysis of each of the commissioning events, using event specific exhaust parameters, to confirm that the modeling results do represent worst-case conditions.
  - d. If this screening analysis indicates that another commissioning event represents worst-case, please remodel the commissioning emissions and present the revised modeling results.
  
6. The emergency diesel generator SO<sub>2</sub> emissions appear to be based on 0.25% (2500 ppm) sulfur fuel (AP-42). This sulfur content is five times the California Motor Vehicle Diesel Standard. Please correct the emissions calculations and modeling results to reflect the use of 0.05% (500 ppm) sulfur diesel.

**BACKGROUND**

The Applicant is proposing a higher ammonia slip concentration (10 ppm @ 15% O<sub>2</sub>) than is recommended in the CARB Guidelines for Power Plants (5 ppm @ 15% O<sub>2</sub>).

**DATA REQUEST**

7. Please identify why this project cannot meet an ammonia slip level of 5 ppm (@15% O<sub>2</sub>). Also please identify measures, including increasing catalyst surface area, that might allow the project to meet the BACT guideline level for ammonia, and identify the associated costs of such measures.

**Henrietta Peaker Project (01-AFC-18)  
Data Requests**

**BACKGROUND**

Emission Reduction Credits (ERCs) from the same ERC holders are being used for the Henrietta Peaker Project and the Tracy Peaker Project. Staff needs additional information to be assured that there are sufficient ERCs identified for this project.

**DATA REQUEST**

8. Please provide documentation for the total number of ERCs available to GWF from the following ERC holders:
  - a. NO<sub>x</sub> ERC Source A; located at Elk Hills (Kern County)
  - b. VOC ERC S-1538-1; located at 2512 Coffee Road, Bakersfield
  
9. The certificate of transfer to GWF was not complete at the time of AFC submittal for the Source A NO<sub>x</sub> ERCs. Please provide copies of the option contracts for this source of ERCs.

**Henrietta Peaker Project (01-AFC-18)**  
**Data Requests**

**Technical Area:** Cultural Resources

**Author:** Dorothy Torres

**BACKGROUND**

To conduct a complete analysis, staff needs to identify all built environment resources that are older than 45 years that could be impacted by the project. This request applies to all resources older than 45 years that are crossed, undercut, or adjacent to the proposed project site and linears. The Confidential Appendix to the AFC provides information, on page C-10, that the Henrietta Substation was built in 1960. Appendix F, VOL II, p. 7 identified it on a 1956 map.

**DATA REQUEST**

10. Please provide a DPR 523 form completed by an architectural historian or an historian with a background in industrial, architectural, or public history for the following potential cultural resources: the Henrietta Substation, transmission lines that connect to the substation (if older than 45 years) and roads, canals or ditches older than 45 years, that may be impacted (crossed, undercut, adjacent to) by the project.

**Henrietta Peaker Project (01-AFC-18)  
Data Requests**

**Technical Area:** Efficiency

**Authors:** Shahab Khoshmashrab and Steve Baker

**BACKGROUND**

As designated in the AFC, the applicant states that an evaporative inlet air cooling system will be installed for the project (HPP 2001a, AFC §§ 1.5.2, 1.5.6, 2.2.3, 2.2.4, Appendix H6 §2.0). Subsequently, the applicant states that a fogging system will be utilized as the project's inlet air cooling system (HPP 2001a, AFC § 2.2.8).

**DATA REQUEST**

11. Please clarify which one of the two inlet cooling systems, described above, will be used for this project.

**BACKGROUND**

As designated in the AFC, the applicant states that it will employ two GE LM6000 PC Sprint Combustion Turbine Generators (CTG)s for the HPP (HPP 2001a, AFC §§ 1.5.2, 2.2.2, 2.2.4, 5.3.1, 5.3.5). Subsequently, the applicant states that two GE Model PG7121(EA) CTGs will be used for the HPP (HPP 2001a, Appendix H6 §2.0, Major Equipment List).

**DATA REQUEST**

12. Please clarify which one of the CTG models, described above, will be employed for this project.

**Henrietta Peaker Project (01-AFC-18)  
Data Requests**

**Technical Area:** Geological Hazards

**Author:** Dr. Dal Hunter, P.E., C.E.G.

**BACKGROUND**

In Section 8.15.2.2 on page 8.15-11 (second paragraph), the AFC stated that the entire project area is within *CBC* Seismic Zone 3, and therefore, will have a Z value of 0.30. However, Section 3.4.2 of Appendix H2, page H2-20, states that the plant is located in Seismic Zone 4 and that the plant structures will be designed accordingly.

**DATA REQUEST**

13. Please clarify the *CBC* Seismic Zone and seismic design criteria for this project.

**BACKGROUND**

Section 8.15.1.4 (Hydrogeology) on page 8.15-9, and Section 8.15.2.3 (Soil Liquefaction) on page 8.15-12 both refer to a geotechnical investigation performed by Kleinfelder in 2001. The referenced geotechnical report has then been included as Appendix H1-3 and is dated July 12, 2001. In Section 3.4 of Appendix H1-1 (Geotechnical Investigation) on page H1-1-15, it is stated that "A preliminary geotechnical investigation for the project has been prepared by Hultgren-Tillis Engineers, and is dated June 26, 2001."

**DATA REQUEST**

14. Please verify that there is not an additional geotechnical investigation by Hultgren-Tillis Engineers; or, if there is such an investigation, please provide it for Energy Commission review.

**Henrietta Peaker Project (01-AFC-18)**  
**Data Requests**

**Technical Area:** Hazardous Materials Management

**Author:** Ramesh Sundareswaran

**BACKGROUND:**

Section 8.6.1 of the AFC identifies receptors in relation to the Henrietta site. However, pertinent details are lacking.

**DATA REQUEST:**

15. Verify with the local school district as to whether any new schools are proposed or under construction within a one- mile radius of the site. Identify their locations accordingly on figure 8.6.2.
16. Identify whether there are any private airstrips within a two-mile radius of the site. Identify their locations on figure 8.6.2. Provide an analysis discussing the safety hazards posed by the proximity of the site to the airstrips, if applicable.
17. Provide an analysis discussing the hazards posed by the flight operations of the neighboring Lemoore Air Station in relation to the proposed site.
18. Clarify whether the New Star facility will be reactivated in the future.

**BACKGROUND:**

Section 8.12.3.5 mentions the use of the SCREEN3 model for off-site consequence analysis modeling. However, it lacks information on the data used as input for modeling purposes.

**DATA REQUEST:**

19. Please provide the parameters used in SCREEN3 to model the off-site consequences of the project. Your response should included the parameters of the modeled stack, its height, and the stack gas velocity used. The response should also provide a justification for selection of these parameters.

**Henrietta Peaker Project (01-AFC-18)**  
**Data Requests**

**Technical Area:** Land Use

**Author:** Mark R. Hamblin

**BACKGROUND**

On July 31, 2001, the Kings County Board of Supervisors passed Resolution No. 01-081 – “In The Matter Of Tentative Cancellation Of Land Conservation Contract No. 1853.” The resolution presents the Board’s approval of the tentative cancellation of a portion of Land Conservation Contract No. 1853. It states that a final Board action on the contract’s cancellation (Certificate of Cancellation) and its recording will not occur pending completion or fulfillment of the following requirements:

- Payment of the land conservation contract cancellation fee to the Kings County Treasurer;
- Payment of a cancellation processing fee to Kings County; and
- Review and certification by the Kings County Board of Supervisors as a responsible agency of the final California Environmental Quality Act document prepared by the California Energy Commission (Energy Commission).

The Resolution states that the County is proposing to use the Energy Commission’s Staff Assessment as the environmental document for the County’s Certificate of Cancellation for the land conservation contract.

There is an issue regarding the timing sequence of events for the cancellation of the land conservation contract. Energy Commission staff needs the final action of the County Board of Supervisors on the cancellation in order to complete the land use analysis for the SA. Until a final action is taken, Energy Commission staff cannot conclude that the project is consistent with local LORS (laws, ordinances, regulations, and standards) since land conservation contracts preclude the building of a power generation facility on contracted land.

**DATA REQUEST**

20. Please provide the schedule and processes for approval of the Certificate of Cancellation.

**Henrietta Peaker Project (01-AFC-18)**  
**Data Requests**

**BACKGROUND**

Section 403. D.11, *Exclusive Agricultural District* of the Kings County Zone regulations, states that “thermal power generating facilities, that commercially produce power for sale, which comply with all San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD), State and Federal air quality laws” are a conditional use of the zone that requires the approval of the Kings County Planning Commission.

**DATA REQUEST**

21. The project owner shall provide the Energy Commission a letter from the Kings County Planning Department stating that the Henrietta Peaker Project meets the “findings” for the granting of a conditional use permit by the County. The County should cite the findings and provide any County “conditions of approval” for the use permit that may be applicable to the project in their letter.

**BACKGROUND**

The Henrietta Peaker Project (HPP) is to be developed on a 7 acre parcel portion of a 20 acre parcel in an area zoned AX (Exclusive Agricultural District). According to the Kings County zoning regulations, the AX Zone is intended primarily for application to those rural areas of the county where it is necessary and desirable to reserve land for exclusive agricultural use. Exclusive agricultural use areas are generally suitable for the raising of crops or small concentrations of livestock because of high quality of soils, scenic characteristics, existing or potential irrigation works or exclusive agricultural character of the area.

The incremental conversion of agricultural land to nonagricultural uses threatens the long-term health of the state’s agricultural industry and presents a potential impact under the California Environmental Quality Act (CEQA).

On page 2.5-1 of the Application For Certification Supplement, Reponse 17 states that “GWF proposes to contribute funds to the American Farmland Trust for the procurement of conservation lands on a 1:1 basis within Kings County, if possible, or otherwise within areas that are in close proximity to the County. With this mitigation there are no direct or cumulative impact from the HPP.”

**DATA REQUEST**

22. Before the amended Staff Assessment (SA) is published, please provide the Energy Commission with a copy of the final agreement signed by the applicant and the American Farmland Trust. The executed agreement must demonstrate the applicant’s fulfillment of their mitigation requirement for the conversion of the agricultural land due to the project.

## **Henrietta Peaker Project (01-AFC-18) Data Requests**

### **BACKGROUND**

The proposed project is to be located about 1 mile south of Lemoore Naval Air Station (NAS) where the Pacific Strike Fighter Wing and its supporting facilities are located. The Navy's newest and largest master jet air station is also located on the air base.

A height limitation is a common Federal Aviation Regulation Part 77 requirement. The base maintains a "clear/approach zone" or "buffer zone" with respect to structures that may affect aviation safety. In the wake of the September 11, 2001 terrorist actions in New York, and Washington D.C. the military air base may have new aviation regulations regarding a security zone/buffer around the base. On September 18, 2001 a Energy Commission staff person attempted to drive down 25th Avenue to view the proposed site. However, 25th Avenue was barricaded to prevent vehicular access at State Highway 198 to the north of the project site and at the Avenal Cutoff to the south of the site.

### **DATA REQUEST**

23. Please contact Lemoore Naval Air Station to discuss any air base security/buffer zone issues generated by the proposed HPP with the appropriate air base personnel (i.e. aviation safety officer, security officer, etc.). Please provide the Energy Commission with copies of any records of conversation regarding this matter.
24. Please discuss the current status of 25th Avenue with respect to project site access.
25. Please contact the appropriate Airport Land Use Commission (ALUC) that serves the County of Kings regarding the proposed HPP. Please provide the Energy Commission with a copy of the ALUC's consistency determination regarding the HPP project.

**Henrietta Peaker Project (01-AFC-18)  
Data Requests**

**Technical Area:** Socioeconomics

**Author:** James Adams

**BACKGROUND**

With respect to the four month review process, Section 25552 (d) (3) of the Public Resource Code requires an applicant to contract with a general contractor, and to contract for an adequate supply of skilled labor to construct, operate, and maintain a thermal power plant. Staff must assure that the required labor has been contracted in order for the Commission to make a finding that Section 2552 (d) (3) has been met.

**DATA REQUEST**

26. Please provide evidence of a contract with a general contractor and contract(s) with one or more sources of skilled labor to construct, operate and maintain the proposed project, to include associated linear facilities.

**Henrietta Peaker Project (01-AFC-18)**  
**Data Requests**

**Technical Area:** Soil and Water Resources

**Author:** Antonio Mediati and Jon Schulman

**BACKGROUND**

The property on which the HPP is to be built has an existing entitlement of 44 acre-feet of Central Valley Project water. This water is to be delivered to the HPP site. Data Adequacy Response (DAR) 25 states “GWF does not intend to remove the remainder of the parcel from agricultural use.”

The second source of water for the HPP is Kings County. Kings County is a contractor for water from the State Water Project (SWP).

**DATA REQUEST**

27. Please describe whether there will be an agricultural use of water on the GWF parcel in the future, how much water will be required for agricultural production on an annual and seasonal basis, and how will any agricultural use of water affect the water supply for the HPP.
28. Please provide a copy of the CVP contract and documentation indicating the ability to transfer or convert CVP water from agricultural use to industrial.
29. Please provide a summary of the amount of CVP water that has been used by the GWF parcel in the past, and compare this to the total amount that will be used by this parcel after construction of the HPP, including any future agricultural water use. An analysis should be presented to show how the use of water by the HPP and any future agricultural activities on the site could affect the supply to other users of Delta-Mendota Canal water based on the actual amounts that have been delivered by the canal in the past.
30. Please clarify whether and how the SWP water to be supplied to the HPP is currently being used, and how the HPP allotment will affect the use of this water by others.
31. Please provide information on any seasonal variability in the water allocation or other timing restrictions.
32. Please provide a will-serve letter from the CVP.

**BACKGROUND**

Construction of the HPP may induce water and wind erosion at the power plant site. Surface water runoff is to be directed around the construction site to minimize erosion and pollutant loading. A Storm Water Pollution Prevention Plan (SWPPP) will be required for construction.

## **Henrietta Peaker Project (01-AFC-18)**

### **Data Requests**

The AFC Supplement states that peak flows for storm pipes and culverts will be calculated based on a 25-year, 24-hour storm. The AFC states that all non-contact runoff is collected and drained to the onsite detention basin. The drainage system is to be designed for a 10-year, 10-day rainfall event. Contact runoff will be routed to an oil-water separator. Water from the oil-water separator will be recycled on site or disposed of offsite. The capacities and hydrologic/hydraulic design of this system are not described in sufficient detail to demonstrate that they will function as intended. The runoff from this area could be impracticably large for a holding tank.

The AFC states that the project will “not require a permit under the General Permit for Discharge of Stormwater Associated with Industrial Activity” by virtue of the fact that the HPP will not discharge stormwater to designated waters of the U.S. This statement is based on the proposed construction of the detention basin and holding tank. The detention basin and holding tank could receive stormwater runoff in excess of the design capacity, or could be full from previous storms at the time of a rainfall event, resulting in overflow. It is not clear how this overflow will be handled, nor what the associated water quality and regulatory implications are.

#### **DATA REQUEST**

33. Please include grading and drainage plans with existing and proposed contours showing existing and proposed watershed areas, peak discharge rates and volumes at key concentration points, and conceptual design and capacities of the proposed conveyance systems, erosion control features, detention/evaporation/percolation basin and holding tank. The contact and non-contact drainage systems and design should be clearly differentiated in terms of location, watershed area, drainage conveyance design, storage system design, peak flow rates and runoff volumes. The plan should include pre-development and post-development storm water discharge rates and volumes for contact and non-contact areas for the 5, 10, 25- and 100-year recurrence intervals, and a description of how frequently runoff volumes are expected to exceed the capacity of the detention basin and holding tank, and how excess runoff will be accommodated and prevented from carrying contaminants offsite in the event of back-to-back storms or storms in excess of the storage capacity. Please provide a narrative description as well as conceptual plans and design details with all back-up hydrologic and hydraulic calculations used in developing the drainage concept design.

#### **BACKGROUND**

According to the AFC, bottled water will be brought in for drinking. A septic tank is proposed for disposal of domestic sanitary wastes.

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**DATA REQUEST**

34. Please provide a description of the amount of water required on a daily basis for domestic purposes, and the source of the water used for toilets.
35. Please provide a description of the septic system.
36. Please provide a plan showing the proposed septic system, the location of, and distance to, the nearest groundwater wells.

**BACKGROUND**

The AFC Supplement provides a groundwater quality data table (Table 8.14-5).

**DATA REQUEST**

37. Please provide basic well description (including location, depth, age, gpm, etc).
38. Please provide information on the depth from which the water sample was attained.
39. Please provide any additional water sample analysis to assure that the water quality data is representative of the aquifer. Provide copies of the lab analytical reports.
40. Please provide some characterization of the perched aquifer, which is within six feet of the ground surface, such as its horizontal extent, depth and quality.

**BACKGROUND**

The AFC Supplement provides a water source alternatives cost evaluation table (Table 8.14-6).

**DATA REQUEST**

41. Please provide information on how these costs were derived and whether they are annual expenses or for the life of the project.

**BACKGROUND**

Acres of soil surface to be disturbed needs to be clarified.

**Henrietta Peaker Project (01-AFC-18)**  
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**DATA REQUEST**

42. In section 8.9.2.1 you state that “7 acres of surface soils will be excavated”, then in section 8.9.2.4 you state that “12 acres of soil will be disturbed”. Please clarify the actual amount of acreage to be disturbed. In addition what is the depth of excavation or soil disturbance.

**BACKGROUND**

A complete and detailed stormwater and erosion/sediment control plan for the facility and all linear facilities is needed as part of the Storm Water Pollution Prevention Plan (SWPPP).

**DATA REQUEST**

43. Provide a stormwater and an erosion/sediment control plan for the facility and all associated linear facilities. The plan should include a detailed set of drawings that depict existing and proposed topography, structures, facilities, staging areas, and soil stockpile areas. Provide and describe the BMPs you intend to implement related to erosion control during construction activities.

**BACKGROUND**

There needs to be more clarification on the amount of acreage to be impacted or lost to agricultural production.

**DATA REQUEST**

44. In the Summary of Effect, it is stated that the HPP will only permanently impact the seven acres used for the proposed plant site. Again under section 8.9.6 Laws, Ordinances, Regulations, and Standards – California Environmental Quality Act it is stated that the HPP will permanently remove seven acres of land from agricultural production. However, in section 8.9.2.4 Summary of Effect the last sentence of the first paragraph states “The loss of 20 acres of isolated agricultural land with soil of limited agricultural potential is not considered a significant impact”. Please clarify the actual acreage to be impacted or removed from agricultural production.

**BACKGROUND**

The Storie Index provides a numerical expression of the suitability of soil for intensive farming, based on the characteristics of the soil profile and the surface (Arroues and Anderson, 1986). Based on the soil survey, Lethent clay loam has a Storie Index of 41,

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which corresponds to Grade 3. Grade 3 soils are only fairly well-suited to farming and are limited in their agricultural potential. (City of Hanford Planning Department, 1988)

**DATA REQUEST**

45. Please provide clarification of the Storie Index. Is it an index and grade developed by the Natural Resources Conservation Service (formerly Soil Conservation Service) or the City of Hanford Planning Department?

**BACKGROUND**

In order for a soil to be classified as “Farmland of Statewide Importance”, it has to have a good combination of physical and chemical features for the production of agricultural crops. Lethent clay loam is designated as Farmland of Statewide Importance. In section 8.9.2.4 the last sentence states that “The loss of 20 acres of isolated agricultural land with soil of limited agricultural potential is not considered a significant impact”. However, Lethent clay loam is designated as “Farmland of Statewide Importance”.

**DATA REQUEST**

46. The statement from the City of Hanford Planning Department is not consistent with the classification of Lethent clay loam as a “Farmland of Statewide Importance. Please clarify whether this soil has limited agricultural potential or has a good combination of physical and chemical features for the production of agricultural crops as required for the designation of “Farmland of Statewide Importance.”

**BACKGROUND**

Engineering properties of the soils on site are critical to assessing site suitability.

**DATA REQUEST**

47. Please provide engineering properties of the soils as determined by the soil survey and geotechnical investigation. Please provide in their entirety all completed and geotechnical investigations as they become available.

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**BACKGROUND**

The laydown area and other portions of the site which will be disturbed during construction will be reclaimed or eventually returned to agricultural production when construction is completed.

**DATA REQUEST**

48. Please provide a list of reclamation species to be used prior to return to agricultural use.

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**Data Requests**

**Technical Area:** Traffic and Transportation

**Author:** Tami Borton

**BACKGROUND**

To develop the Henrietta Peaker Project, the project applicant proposes to transport heavy equipment and hazardous materials via area roadways and railroads. Specific transportation routes are not identified in the above-referenced AFC. The applicant also proposes a 1.7-mile linear of 16-inch pipeline within the right-of-way of Highway 152/Holscow Road. As proposed in this AFC, all construction activities would remain either within the right-of-way, or on the proposed construction site and staging area.

**DATA REQUEST**

49. Please provide the following items:
  - a. The rail lines that will be used.
  - b. The locations of the spurs to be used for unloading.
  - c. The roadway routes to be used from the rail spurs, to and from the project site.
50. Please provide the following information related to transport of hazardous materials:
  - a. Specify what types of hazardous equipment or hazardous chemicals will be transported to the project site.
  - b. Specify which railway(s) and roadway(s) will be used for hazardous material transport.
51. Please indicate the types of traffic control programs that will be used to ensure safe roadway conditions (e.g. lane marking, construction notices, roadway signage, detours, flagperson).
52. Please indicate the policies that will be in place to ensure that project construction workers will park in designated areas.
53. Please discuss whether transportation will be available from a central parking area to and from the work site(s) for the linear facilities.

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**Data Requests**

**Technical Area:** Visual Resources  
**Author:** David Tatsumi and Eric Knight

**BACKGROUND**

Staff will need to make use of the Applicant's figures presented in the AFC and supplemental filings.

**DATA REQUEST**

54. Please provide a CD containing electronic versions of Figure 8.11-1 and the new figures as requested in the following Data Requests.

**BACKGROUND**

Five key observation points (KOPs) were established in order to evaluate both the visual setting and the potential for project-induced visual impacts. Existing view photographs were obtained at each KOP and presented along with visual simulations of the proposed project. The AFC does not explain whether the color photocopies of the photographs and simulations are at life-size scale. The presentation of images at a reduced scale does not accurately represent the views that would be experienced at the KOPs because these images understate the prominence of visible landscape features as well as potential visual impacts. In addition, some of the images are too dark or light, making it difficult to clearly discern the landscape elements and project structures in the setting photographs and simulations.

**DATA REQUEST**

55. Please explain whether the photocopies in the AFC of the existing setting photographs and simulations of the proposed project from each of the KOPs are at life-size scale, when viewed from a normal reading distance of approximately 18 inches. If the photocopies are not at a life-size scale, please re-scale all setting and simulation images to achieve life-size scale. If re-scaling results in substantial degradation of the image, please provide new setting and simulation images at life-size scale. After obtaining appropriately scaled images, please provide photocopies of high quality 11"x17" color images of the existing views and simulations.
56. Please provide images with correct light exposure.

**BACKGROUND**

Section 8.11.1.3 *Visual Resources in the Vicinity of the HPP Site, KOP-1* (page 8.11-3) states that, "The view has low to moderate vividness associated with... the silhouette of the low foothills east of the area." However, the low foothills could not be identified due to a persistent "mist" or "haze" throughout the site and general vicinity (site observed: 10-15-01,

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approximately 12:30 p.m. Pacific Time). Figure 8.11-2 shows a faint outline of what appears to be a range of mountains south of the site.

**DATA REQUEST**

57. Please identify the low foothills to the east, the elevations of the peaks and the approximate distance from the site.
58. Please provide meteorological information describing the nature of the “mist or haze” and its duration throughout the day and season.

**BACKGROUND**

A construction site was observed immediately east of NAS Lemoore that was not identified in the Visual Resources section. Base personnel stated that it was their impression that this new construction was part of the NAS. It was believed that further construction could be planned on land immediately east of KOP 1.

**DATA REQUEST**

59. Please identify the characteristics (physical description and use) of this current new construction.
60. Please provide information from Kings County and/or NAS Lemoore (or whoever has authority over the land use of that area) regarding the future land use plan for the area east of NAS Lemoore, specifically the land between KOP 1 and Avenal Cutoff Road.

**BACKGROUND**

Section 8.11.1.3 Visual Resources in the Vicinity of the HPP Site, KOP-2 (page 8.11-3), describes the houses located along SR 198 at NAS Lemoore. It states, “These homes are slightly lower in elevation than the SR 198 roadway and will not have a direct line-of-sight view from the first floor.”

**DATA REQUEST**

61. Please provide line-of-site profile drawing from the HPP from the first floor of the housing units at KOP 2.

**BACKGROUND**

Figure 8.11-11 *Photo simulation of Proposed HPP at KOP-5* shows the view to the site after the construction. The requested information is needed to determine the accuracy of the photo simulation.

**Henrietta Peaker Project (01-AFC-18)**  
**Data Requests**

**DATA REQUEST**

62. Please provide information regarding the creation of the photo simulation including modeling methodology, visual reference benchmarks, etc., that would allow an independent reviewer to verify that the simulation is accurate. This should include the surveyed plans that show the location of existing power poles (to be used as benchmarks) and the HPP major structures. Please provide the heights of existing roadside power poles between KOP 5 and the HPP.

**Henrietta Peaker Project (01-AFC-18)**  
**Data Requests**

**Technical Area:** Worker Safety & Fire Protection

**Author:** Ramesh Sundareswaran

**BACKGROUND:**

Section 8.7.3.2 of the AFC indicates that the Kings County Fire Department (KCFD) will act as first responders to incidents at the Henrietta site but does not categorically state whether the first incident responders can respond to hazardous materials incidents at the Henrietta site.

**DATA REQUEST:**

63. Please provide verifiable data that the KCFD and in particular stations 5, 7 and 10, have trained personnel and associated equipment to respond to hazardous materials incidents at the site. Otherwise, furnish details of cooperative steps that the Applicant is willing to undertake in conjunction with the local authorities, to ensure that the KCFD can respond to hazardous materials at the site. In either case, provide details on how the service ratios, response times or other performance objectives set by the KCFD will be met.