CALIFORNIA ENERGY COMMISSION
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August 5, 2008

Mr. Joe Stenger
Project Manager
TRC Solutions
2666 Rodman Drive
Los Osos, CA 93402

Dear Mr. Stenger:

ORANGE GROVE PROJECT (08-AFC-4)
DATA REQUESTS 1 to 73 (SET #1)

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff is asking for the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project; 2) assess whether the facility will be constructed and operated in compliance with applicable regulations; 3) assess whether the project will result in significant environmental impacts; 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner; and 5) assess potential mitigation measures.

The requested information in Data Requests Set #1 is in the technical areas of air quality, alternatives, biological resources, cultural resources, hazardous materials management, public health, socioeconomics, soil and water resources, transmission system engineering, waste management, and worker safety/fire protection. Written responses to the enclosed data requests (Set 1) are due to the Energy Commission staff before September 5, 2008.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to me and the Committee within 20 days of receipt of this request. The notification must contain the reasons for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please call me at (916) 654-4640, or email at fmiller@energy.state.ca.us.

Sincerely,

Felicia Miller, Project Manager
Energy Facilities Siting Division

Enclosure

Technical Area: Air Quality
Author: William Walters

Operating Emissions Mitigation

BACKGROUND

The Energy Commission has created a mitigation condition for the Chula Vista project that it intends to apply to the Orange Grove Project, with project specific changes. The project specific changes would be the use of Orange Grove specific operating emission factors, inclusion of the two diesel engine emissions, inclusion of the chiller cooling tower emissions, and inclusion of the water trucking emissions. Staff also intends to maintain the assumed per turbine maximum 1,200 hour per year operating basis (modified slightly for this case to be based on 1,000 full load operating hours, 100 startup hours and 100 shutdown hours); and maintain the per ton cost factor ($16,000 ton per the current Carl Moyer Memorial Air Quality Standards Attainment Program cost effectiveness guidelines. The Carl Moyer Program was established by the California Air Resources Board in 1998 to provide funding for the incremental cost of cleaner-than-required engines, equipment, and emission reduction technologies. Since it is an incentive program, participation in the Carl Moyer Program is voluntary. The Carl Moyer Program plays a complementary role to California's regulatory program by funding emission reductions that are surplus, i.e., early and/or in excess of what is required by regulation. The program accelerates the turnover of old highly-polluting engines, reduces the costs to the regulated community, speeds the commercialization of advanced emission controls, and reduces air pollution impacts on environmental justice communities. Local air districts administer the program and select grant recipients.) plus the program administration fee of 20 percent. Staff needs to know if the applicant has any issues with this proposed mitigation.

DATA REQUEST

1. Please review staff's Chula Vista Preliminary Staff Assessment proposed Condition of Certification AQ-SC6, and provide any comments or questions regarding staff's mitigation proposal.

Water Trucking Emissions Estimate

BACKGROUND

The applicant's water trucking emission estimate uses conservative tailpipe emission factors, does not include fugitive dust emissions, and does not use the same round trip distances noted in the project description. Since these emissions are to be included in the mitigated emissions totals, staff recommends, that the applicant revise the tailpipe emissions to reflect new trucks (as have been stipulated to be used) versus the fleet average emission factors used in the emission estimate. Also, for the emission estimate to be complete the paved road dust PM10 (particulate matter 10 microns or smaller)

emissions need to be added to the total trucking emissions. Therefore, staff is requesting a revision to the trucking emissions estimate.

DATA REQUEST

2. Please revise the water trucking tailpipe emissions, if desired, based on new truck emission factors from EMFAC2007.

3. Please revise the water trucking emission to include paved road PM10 emissions.

4. Please revise the water trucking emission calculations to use a round trip distance for reclaimed water trucking trips of 31.2 miles.

Emissions Dispersion Modeling

BACKGROUND

The modeling files have differences in the inputs from the last modeling runs performed for the project during the SPPE process. The locations of the modeled construction emission sources and receptors have moved approximately 80 meters to the west and 200 meters to the north from previous modeling runs. Staff needs more information to understand the changes to the locations of the sources and receptors.

DATA REQUEST

5. Please confirm that the corrections to the emission source and receptor locations were made to correct the coordinates of the site area.

Gas Turbine Best Available Control Technology (BACT) Levels for Volatile Organic Compounds (VOC)

BACKGROUND

The response to round two Data Request 112 of the SPPE case indicated that the proposed BACT VOC emissions concentration would be 2.0 ppm, and that the applicant would forego the expected reduction from the oxidation catalyst for permitting purposes. The emissions estimate in the AFC still includes the oxidation catalyst assumed VOC emission reduction. Staff needs to confirm that the permitted emission basis is 2.0 ppm and 1.25 lbs/hour and not the reduced emission value of 0.42 lbs/hour shown in the Appendix 6.2-C Table 6.2C-12.

DATA REQUEST

6. Please confirm that the BACT VOC emission basis for permitting is 2.0 ppm and 1.25 lb/hr.

Gas Turbine Initial Commissioning Modeling

BACKGROUND

The applicant's modeling analysis for initial commissioning uses hour of day emission rate factors that indicate no emissions from initial commissioning will occur from 7 pm to 7 am. Staff needs to understand why these hour of day emission rate factors were used and determine if the applicant is willing to stipulate to this hour of day operating profile during initial commissioning prior to fully functional Selective Catalytic Reduction (SCR) and oxidation catalyst operation.

DATA REQUEST

7. Please indicate why the initial commissioning modeling assumed only 7 am to 7 pm operation.

8. Please confirm that the applicant is willing to stipulate, in a condition of certification, to an initial commissioning operating hour limitation of 7 am to 7 pm prior to fully functional operation of the SCR and oxidation catalyst.

9. If the response to Data Request 8 is no, then please remodel the initial commissioning emissions without the hourly scalars (i.e. no hourly restrictions).

Cumulative Projects and Cumulative Impact Analysis

BACKGROUND

The AFC makes the case that two new large projects in the area, the Gregory Canyon Landfill and the Rosemary's Mountain Quarry Projects, would not result in cumulative air quality impacts. However, these two projects are both well within 6 miles of the site and would be expected to have onsite emissions of a magnitude greater than what staff normally uses to screen cumulative projects (5 tons per year). Therefore, further analysis of the operating cumulative impacts for air quality seems warranted.

DATA REQUEST

10. Please provide available information on the onsite criteria pollutant emission estimate for the Rosemary's Mountain Quarry Project.

11. Please provide available information on the onsite criteria pollutant emission estimate for the Gregory Canyon Landfill project.

12. If the emissions are greater than 5 tons per year for any criteria pollutant, excepting CO, for either of these two projects then please provide:

    a. A cumulative modeling protocol for the completion of a cumulative modeling assessment.

    b. After approval of the cumulative modeling protocol please provide the cumulative modeling analysis including electronic files.

SDAPCD Determination of Compliance

BACKGROUND

The proposed project will require a Preliminary and Final Determination of Compliance from the SDAPCD. Staff understands that a new permit application was not required to be submitted; however, staff is unsure if supplemental materials, other than AFC materials, have been submitted to the District. Staff needs copies of the information going to and from the District to ensure that there is consistency between the District and staff's understanding of the project during the licensing/permitting process.

DATA REQUEST

13. Please provide a copy of any supplemental permit application materials, other than direct copies of AFC application materials, which have been submitted to the SDAPCD.

14. Please provide, up until the Commission's evidentiary hearings, copies of all substantive materials submitted to and received by the SDAPCD within a week of their submittal/receipt.

Greenhouse Gas Emissions Estimate

BACKGROUND

The proposed Orange Grove project will use a chiller that will have refrigerant losses. The refrigerant noted to be used is HFC-134a (page 2-24 of the AFC), which has a GHG carbon dioxide equivalency of 1,300. Staff needs additional information to categorize the full GHG emission potential for the Orange Grove Facility.

DATA REQUEST

15. Please confirm the type of refrigerant used in the chiller and indicate why a refrigerant with a lower GHG emission potential such as HCFC-123, which is being proposed for the Riverside Energy Resource Center chiller, is not being proposed for the Orange Grove chiller.

16. Please provide an annual leak rate estimate for the chiller refrigerant.

17. Please provide a carbon dioxide equivalent GHG emission estimate for the chiller, per operating hour, per year and for the life of the project.

Technical Area: Alternatives
Author: Suzanne Phinney

BACKGROUND

The AFC evaluates the four sites offered in the SDG&E RFO, which include the Margarita Site. Section 5.2.1 states that the Margarita Site was not selected because it does not meet some of the Project's basic objectives, but does not specify which objectives are not met.

DATA REQUEST

18. Please explain why the Margarita Site was not selected.

BACKGROUND

Sections 5.2.3 and 5.2.4 of the AFC state that new transmission line interconnections would be required to connect the GCL North and South sites to the Pala Substation. It is unclear whether the additional transmission infrastructure would cross the highway and where the connections would occur.

DATA REQUEST

19. Please provide a diagram of the configuration of transmission line interconnections from the GCL North and South sites to the Pala Substation.

BACKGROUND

In the AFC, Table 5.10-1 compares the relative impacts on biological resources of the GCL South and North sites to the Orange Grove site. From the discussion in Sections 5.10.2.1 and 5.10.2.2, the comparisons were primarily determined by direct disturbance to sensitive habitat type. No mention is made of effects on adjacent habitat.

DATA REQUEST

20. Please examine whether GCL South's proximity to the San Luis Rey River would have any impacts on the biological resources associated with the river or its riparian habitat.

21. Based on the findings, please state how the biological resources comparison in Table 5.10-1 would change or remain the same.

Technical Area: Biological Resources
Author: Susan Sanders

BACKGROUND

Limited Construction Period/Directional Drilling: The AFC describes results of surveys indicating that California gnatcatchers and least Bell's vireos nest in close proximity to the proposed gas pipeline, and that foraging/movement areas for arroyo toad also occur near portions of the pipeline alignment and staging areas. Page 6.6-54 of the AFC lists project design features to avoid significant impacts to these endangered species, including "*limited construction periods will be used to avoid the active season of federally listed species that occur along some portions of the Project linear corridor or the reaches of the corridor adjacent to these resources will be directionally drilled to avoid potential indirect impacts from noise and construction activities*." However, the AFC does not provide specific information as to where and under what circumstances directional drilling would be used in the riparian areas, and when and where the limited construction period would apply.

DATA REQUESTS

22. Please provide a detailed discussion of how and where limited construction periods and horizontal directional drilling will be used to avoid impacts to listed and other special status species (including coastal California gnatcatcher, least Bell's vireo, and arroyo toad).

23. Please include in the above discussion a figure depicting all areas within the project area that will be subject to a limited construction period and horizontal directional drilling. This figure should be at a scale no less than 1 inch = 200 feet, and should clearly show the limits of construction activities in relation to sensitive habitats.

BACKGROUND

Coordination with USFWS: No information is provided in the AFC or the AFC Supplement indicating that the U.S. Fish and Wildlife Service (USFWS) has reviewed the project design features and proposed impact minimization measures and concurs that these measures would avoid take of listed species. The AFC Supplement states that the applicant met with Michelle Moreno of the USFWS on May 27, 2008, but does not indicate that Ms. Moreno agreed that no Section 10 consultation would be required. At the time of the May 27th meeting, Ms. Moreno had not reviewed the AFC, the survey results, or any documentation about the Orange Grove project (Moreno pers. comm. June 26, 2008).

DATA REQUEST

24. Please confirm that the USFWS has reviewed the information in the AFC, as well as subsequent submittals (AFC Supplement, least Bell's vireo and southwestern willow flycatcher survey results) and that the USFWS considers the design features described in the AFC adequate to avoid impacts to listed species.

BACKGROUND

Coordination with California Department of Fish and Game (CDFG): According to the AFC Supplement, the applicant contacted CDFG regarding the need for a 1602 Streambed Alteration Agreement (SAA). The applicant confirmed that even though the gas pipeline would be drilled beneath the drainages and would not result in direct surface impacts to waterways, the CDFG would nevertheless require submittal of a SAA Notification package. However, the AFC and the AFC Supplement make no mention of coordination with CDFG regarding take of listed species or direct, indirect, and cumulative impacts to special status species. Staff needs information regarding CDFG's review and approval of the project design features and proposed minimization measures, and some confirmation that CDFG concurs that these measures would avoid take of listed species.

DATA REQUEST

25. Please confirm that the CDFG has reviewed the information in the AFC, as well as subsequent submittals (AFC Supplement, least Bell's vireo and southwestern willow flycatcher survey results) and considers the design features/minimization measures described in the AFC for the directional drilling installation of the gas pipeline adequate to avoid take of listed species.

BACKGROUND

Coordination with the U. S. Army Corps of Engineers (USACE): No information is provided in the AFC or the AFC Supplement confirming that the USACE has reviewed the project description and the Jurisdictional Waters and Wetland Delineation Report (Appendix 6.5-B of the AFC). The AFC Supplement notes that Laurie Monarres of the USACE met with the applicant on May 27, 2008. However, there is no indication that Ms. Monarres concurred that the horizontal directional drilling proposed at six drainages would avoid all potential impacts to jurisdictional waters, and therefore would not require a Section 404 permit. Staff needs confirmation that the USACE has seen the proposed project description and does not regard boring beneath the drainages as potentially jurisdictional activities. Staff also needs to be informed of any recommendations that USACE might provide to protect drainages during drilling.

DATA REQUESTS

26. Please confirm that the USACE has reviewed the project description and Appendix 6.5-B of the AFC and concurs that a Section 404 permit will not be required for horizontal direction drilling beneath six jurisdictional drainages.

27. Please provide any recommendations made by USACE regarding measures to protect the drainages from impacts during drilling activities.

BACKGROUND

Figures Showing Construction in Relation to Waters/Riparian Habitat: Appendix 2-A, Drawings GP-C850 and GP-C851, are not-to-scale, cross-section drawings of typical boring/encasements through riparian corridors and under jurisdictional waters. The drawings show a generalized 10 foot X 30 foot bore pit excavation with a minimum offset distance from the top of the bank or the boundary of the riparian corridor. Staff needs more detail on the specific locations of the bore pit excavations (and associated spoils pile) in relation to boundaries of waters of the United States or riparian habitat for all drainage crossings and all work near riparian habitat. Staff also needs more details on the specific location of construction/disturbance for bridge construction in relation to the boundary of jurisdictional waters. Drawing C350, the Bridge Plan, does not currently provide this information.

DATA REQUESTS

28. Please provide detailed, site specific, scaled drawings that show the location of all excavation/boring activities in relation to the boundaries of riparian habitat or jurisdictional waters. This information is needed for all segments of the gas pipeline within or near riparian vegetation and for each of the six drainages proposed for horizontal directional drilling.

29. Please revise Drawing C350 to show the boundary of jurisdictional waters in relation to any disturbance associated with bridge construction.

BACKGROUND

Habitat Loss Permit/1602 Application/Willow Flycatcher Survey Results. The AFC Supplement indicates that the applicant will submit the Habitat Loss Permit Application and the 1602 Streambed Alteration Agreement Notification package in mid-July 2008. The southwestern willow flycatcher survey was scheduled for completion by mid-July 2008. Staff needs the information in these applications/reports to prepare their analysis.

DATA REQUEST

30. Please provide copies of the 2008 southwestern willow flycatcher survey results and applications for the Habitat Loss Permit and 1602 Streambed Alteration Agreement.

BACKGROUND

Impact Table and Figure. Table 6.6-4 on Page 6.6-45 of the AFC summarizes the construction impacts to habitat types within the project area, but does not provide a discussion or a figure indicating how these acreage impacts were calculated. Staff needs to know the assumptions that formed the basis for calculating acreage impacts,

which of the impacts are permanent and which are temporary, and the extent of the proposed fuel modification zones in relation to access roads and structures. The Landscaping Plan (Design Drawing L100, Appendix 2-A) shows the limits of Fuel Modification Zones A and B, but this figure is difficult to read and does not show the habitat types encompassed by the zones.

DATA REQUESTS

31. Please provide a figure showing the extent of temporary and permanent impacts and fuel modification zones for each project feature superimposed on an aerial photo/vegetation map. This figure should be at a scale no less than 1 inch = 200 feet.

32. Please describe the assumptions used in developing the boundaries of the fuel modification zones and temporary and permanent impact areas.

BACKGROUND

Missing Maps in Gnatcatcher Report. Maps 1 and 2 were missing from Appendix 6.6-B of the AFC, *2007/2008 Winter and 2008 Breeding Coastal California Gnatcatcher (Polioptila californica californica) Survey Report for the Proposed Orange Grove Project*. In addition, staff needs a figure showing the boundaries of Critical Habitat for coastal California gnatcatchers in relation to project features.

DATA REQUESTS

33. Please provide Maps 1 and 2 that were omitted from Appendix 6.6-B. Maps can be provided in hardcopy on a compact disk.

34. Please provide a figure showing the boundaries of Critical Habitat for coastal California gnatcatcher in relation to project features.

BACKGROUND

Gregory Canyon Landfill Mitigation Lands. The gas pipeline alignment crosses former dairy farms that are now owned by Gregory Canyon, Ltd. and are part of the proposed Gregory Canyon Landfill site. Page 6.9-3 of the AFC states that: "*land from the former dairy farm will be utilized for habitat restoration/creation to mitigate landfill impacts as further addressed in Section 6.6, Biological Resources."* However, there is no discussion in Section 6.6 about the Gregory Canyon Landfill mitigation lands. The USFWS expressed concern about constructing the gas pipeline through areas designated for mitigation/restoration, noting that impacts to mitigation lands might require a higher rate of compensation (Moreno pers. comm. June 26, 2008).

DATA REQUEST

35. Please provide information about the habitat restoration/creation proposed at the Gregory Canyon lands along the gas pipeline alignment, and discuss any potential conflicts resulting from this proposed use.

BACKGROUND

San Diego desert woodrat. The AFC never resolved whether the woodrat nests at the project site were of the special status *Neotoma lepida intermedia* or the common *Neotoma fuscipes*. If the nests belong to the special status woodrat species, an impact analysis will be needed and possibly mitigation measures proposed. The California Natural Diversity Data Base (CNDDB) documents the rare subspecies within three miles of the Project site, so the conservative assumption is that the special status species is present on the project site.

DATA REQUEST

36. Please identify the species of woodrat occurring within the project area. If identification is not possible, please provide an impact analysis and mitigation recommendations assuming that it is *Neotoma lepida intermedia.*

BACKGROUND

Parry's Tetracoccus. Page 6.6-47 of the AFC states that approximately 10 individual Parry's tetracoccus will be impacted during site grading and establishment of the fuel modification zone. The AFC characterizes this impact as less than significant because the loss will be mitigated by either transplanting the Parry's tetracoccus, or by collecting and growing seed. Staff needs more information about the regional context and significance of losing 10 Parry's tetracoccus, and a more detailed mitigation plan. If transplanting or seed collection and propagation is proposed, those activities will need to occur before this fall, therefore a complete mitigation plan is needed as soon as possible. In addition, the discussion of Parry's tetracoccus in the AFC needs to be updated with information from the spring 2008 floristic surveys conducted by Ecological Outreach Services. Figure 6.6-4B of the AFC shows the location of only 11 Parry's tetracoccus, but the CNDDB records from the AFC Supplement indicate a total of 52 individual Parry's tetracoccus detected during the 2008 surveys.

DATA REQUESTS

37. Please update and provide a revised copy of Figure 6.6-4B with information from the spring 2008 floristic surveys.

38. Please provide a more detailed analysis of project impacts to Parry's tetracoccus, including a discussion of what percentage of the local population these 10 plants represent and if there are other nearby populations, and if this loss significantly contributes to regional cumulative impacts.

39. Please provide a specific and detailed mitigation plan, including evidence that salvage and replanting operations or seed propagation are successful with this species, where and when the proposed replanting/mitigation would occur, how the transplanted population be monitored, and what sort of success criteria would be applied to the mitigation plantings.

40. Please provide a copy of Ecological Outreach Services' report describing the results of the 2008 floristic surveys.

Technical Area: Cultural Resources
Author: Amanda Blosser

BACKGROUND

The applicant states in the Supplemental Archaeological Survey Report, that buildings and structures along the gas line route were previously inventoried and evaluated for historic significance as reported to the Energy Commission in response to Cultural Resources Data Requests for the Orange Grove SPPE in October 2007. Appendix 6.7-B of the AFC provides the Orange Grove Project (07-SPPE-2) Responses to Data Requests, but does not provide the required built environment information in a separate technical report as required by Siting Regulation Appendix B (g) (2) (c).

DATA REQUEST

41. Please provide the technical report produced for the AFC built environment survey. The report should include survey procedures and methodology used to identify built environment resources and a discussion of the resources identified by the survey. The report should also include any new and updated DPR523A forms. Only if the project will impact a resource aged 45 years or older is a more detailed DPR523B form required. In addition, the report should include a map which locates these identified resources and the names and qualifications of the cultural resources specialists who contributed to and were responsible for the survey and preparation of the technical report.

BACKGROUND

The applicant cites two technical reports in the References for the Cultural Resources Section of the AFC. Staff needs to review these reports to compile complete information on the cultural resources that could be impacted by the proposed project.

DATA REQUEST

42. Please provide copies of the following technical reports listed in Section 6.7.7 Reference Section:

    a. Urbana Preservation & Planning. 2008a. Letter report: San Diego Aqueduct: Preliminary California Register of Historical Resources Eligibility Review. Submitted to the California Energy Commission, Sacramento, CA.

    b. Urbana Preservation & Planning. 2008b. Orange Grove Project Additional Historical & Cultural Resource Surveys: Reconnaissance Level Archaeological & Built Environment Survey Report, Freshwater and Reclaimed Water Pickup Stations, Yucca Road & Alturas Road, Fallbrook, California. Submitted to the California Energy Commission, Sacramento, CA.

BACKGROUND

The applicant identified a 1940s era orchard at the project site but failed to provide a DPR523 for the resource. Staff needs to review this form to compile complete information on the cultural resources that could be impacted by the proposed project.

DATA REQUEST

43. Please provide a DPR523 form for the 1940s citrus orchard and provide a specific historic context under which to evaluate the significance of the orchard.

BACKGROUND

The applicant identified that the proposed natural gas line route crosses the San Diego Aqueduct, constructed in 1947, and that a staging area for the project will be on the surface over the aqueduct. A previous cultural resources survey examined the area in the vicinity of the crossing point and documented the aqueduct on a DPR523 form. Staff needs a copy of this form to compile more detailed information on this significant resource.

Additionally, in Section 6.7.1.5 of the AFC, the applicant states that the linear facilities for the project will cross the San Diego Aqueduct, and in Section 6.7.3, that the aqueduct will be avoided during construction. Staff needs more information on how the project proposes to avoid impacting this resource.

DATA REQUESTs

44. Please provide the DPR523 for the San Diego Aqueduct completed by Urbana Preservation and Planning.

45. Please describe how the linear facilities crossing the San Diego Aqueduct will be constructed and how impacts to this historic resource will be avoided.

BACKGROUND

Section 4.0 of the Supplemental Archaeological Survey Report states that no new archaeological resources were found in the survey area for the project, but it does not address the potential presence of subsurface archeological deposits in the project area. In the absence of known archeological information which would help to assess the potential for subsurface deposits and possible impacts to these cultural resources, staff recommends that the applicant consider a geoarchaeological study, which would provide a summary of what is currently known of the archaeology, paleoenvironment, and historical geomorphology of the area in the vicinity of the project area. By making use of the methods of earth sciences, the geoarchaeological study would better assess the areas of the project area which have potential due to character and age of the landforms for subsurface archaeological deposits.

There appear to be three geomorphic contexts to consider when addressing the presence of subsurface deposits. The plant site will be located on what appears to be an alluvial fan, the majority of the natural gas line pipeline route from Rice Canyon Road to the eastern crossing of SR 76, traverses the floodplain of the San Luis Rey River, and from the east crossing of SR 76, the natural gas pipeline traverses the lower portion of hills, that appear to be igneous bedrock, to the plant site.

On the basis of a field visit to the project area on July 17, 2008 and discussions with the cultural resource consultant to the applicant, Dr. Tom Jackson of Pacific Legacy, it appears that the portion of the project area through the hills adjacent to the project site and the project site itself could be eliminated from further consideration when considering subsurface archaeological deposits. The igneous bedrock in the hills adjacent to the project has no potential to contain buried archaeological deposits, and the apparent alluvial fan that serves as the location for the project site is thought by Dr. Jackson to be too old to harbor any such deposits as well. Assuming that the applicant is able to provide information to document the age of the project site alluvial fan, then the active floodplain and the alluvial terraces above the San Luis Rey River would appear to be the only geomorphic contexts of concern.

To facilitate a more substantive assessment of whether the proposed project may impact potentially significant subsurface archaeological deposits, staff requests that the applicant provide a geoarchaeological analysis of the project area, the purpose of which would be to assess the likelihood of encountering such deposits.

DATA REQUEST

46. Staff requests that the applicant provide a more thorough analysis of the Orange Grove project site and its linear facilities. Staff recommends that the applicant:

    a. further examine and document the three landforms the project traverses in order to eliminate any parts of the project that sit on or cross landform types that because of age or character would not likely contain archaeological deposits;

    b. research the extant archaeological and Quaternary science literature relevant to the landforms in the project area which have potential for archaeological deposits, in order to better assess the likely presence and probable character of any such deposits;

    c. conduct a geoarchaeological field study that examines the landforms in the project area that may contain archaeological deposits. Staff recommends that the geoarchaeological field study of the alluvial contexts along the San Luis Rey River include the:

        1) excavation of three backhoe trenches in locations along the proposed alignment of the natural gas pipeline for the project that will provide the

opportunity to reliably characterize the alluvial deposits along the length of that alignment to the anticipated depth of the proposed pipeline trench,

2) complete recordation of one prepared profile from each backhoe trench to include reasonably detailed written descriptions of each lithostratigraphic and pedostratigraphic unit in each profile, a measured profile drawing, and a profile photograph with a metric scale and north arrow,

3) screening of a small (3, 5 gallon buckets) sample of sediment from the major lithostratigraphic units in each profile or from two arbitrary levels in each profile through 1/4 inch hardware cloth, and

4) collection and assaying of enough soil humate samples to reliably radiocarbon date the master stratigraphic column for the alluvial deposits along the proposed pipeline route, and

d. provide an analysis of the data that are the result of the above literature review and the field study, and assess, on that basis, the likelihood that the project will encounter buried archaeological deposits, and, to the extent possible, the likely age and character of such deposits.

BACKGROUND

Located approximately 2,400 feet from the project site on the south side of the San Luis Rey river is *Chokla* (Gregory Mountain), which has been identified by the Luiseño as a significant cultural property. Currently Gregory Mountain is being nominated to the National Register of Historic Places as a Traditional Cultural Property and is eligible for listing in the California Register of Historical Resources. The draft nomination was returned to the nomination preparer with comments from the review from the Keeper of the Register. These comments specifically ask the applicant to revise the resource count, the description of the resource, and the discussion of the integrity of Gregory Mountain. Staff needs to review the revised nomination form for this resource to assess potential impacts to it from the proposed project.

DATA REQUEST

47. Please provide the revised copy of the National Register of Historic Places nomination for Gregory Mountain.

Technical Area: Hazardous Materials Management
Author: Dr. Alvin Greenberg

BACKGROUND

This power plant will use, store, and transport hazardous materials. Table 2.8-1 lists the hazardous materials proposed for use at the power plant and identifies each chemical by type and intended use and estimates the quantity to be stored onsite. However, this table does not contain information on the concentrations or identify of all the chemicals to be stored on-site or the CAS number of each chemical. In order to properly assess the management of hazardous materials at the proposed power plant, staff needs to know the concentration of all liquid chemicals. If the project is certified by the Commission, the project owner will be limited to using only those hazardous materials, strengths, and amounts listed on this table.

Also, an accidental spill may require clean-up. Usually, the local fire department provides the "first response" and a contractor provides the clean-up. The AFC makes numerous references to spill containment and response plans (SPCC), worker training, and emergency response plans (ERP) but does not mention the entity that will actually collect and remove spilled hazardous materials. (Staff also wishes to note that the AFC on page 6.15-7 mentions contacting the "San Diego County Fire Department", an entity that does not yet exist.) In order to properly assess hazardous materials management for the proposed power plant, staff needs to know if a hazardous materials spill cleanup contractor has been identified and retained by the applicant to provide cleanup of spills.

DATA REQUEST

48. Please provide the CAS number for all chemicals listed in Table 2.8-1.

49. Please provide the concentrations of sulfuric acid and "chlorine" (staff assumes this is an aqueous mixture of sodium hypochlorite; please identify it as such) that will be stored and used on-site.

50. Please identify the "compressed gases" that will be used and stored on-site.

51. Please identify a hazardous materials cleanup contractor that the project will retain to provide cleanup of any spilled hazardous materials.

Technical Area: Public Health
Author: Dr. Alvin Greenberg

BACKGROUND

The use of trucks to transport water (both reclaimed and fresh) to the site from distant sources will result in air emissions from the diesel-fueled truck engines and thus cause a public exposure along the route to these emissions. Diesel exhaust contains criteria pollutants such as nitrogen oxides, carbon monoxide, and sulfur oxides, as well as a complex mixture of thousands of gases and fine particles. Diesel exhaust contains over 40 substances that are listed by the U.S. Environmental Protection Agency (U.S. EPA) as hazardous air pollutants and by the California Air Resources Board (ARB) as toxic air contaminants. Exposure may cause both short- and long-term adverse health effects including respiratory system disease and cancer. The use of these trucks to transport water through the communities to the project site will occur at regular and frequent intervals when the power plant is running and will continue for the life of the project. The increase in public exposure to diesel engine exhaust could pose a risk to public health and this risk has not been assessed or discussed in the AFC, although the applicant did mention that the trucks will use low sulfur diesel fuel. Since tools are available to conduct an exposure assessment and human health risk assessment of diesel engine exhaust from these water trucks, staff needs to know the full impacts of all phases of the project on public health.

DATA REQUESTS

52. Please provide a quantitative human health risk assessment, including all the modeling files, of the impacts to the public along the transportation routes of the diesel emissions from the trucks transporting water to the power plant.

BACKGROUND

An applicant's health risk assessment should be both transparent and verifiable to reviewers. Staff has spent some time reviewing the modeling files provided by the applicant for this proposed project and is unable to find all of the information needed to quantitatively verify risk results. The HARP/ISC model files that the applicant used to assess cancer risk and chronic and acute impacts are missing some data. While several HARP-generated files have been provided on the "HARP Input and Output Files" CD provided by the applicant, the HARP transaction file (.tra) is missing. Staff needs this file to verify the applicant's risk assessment.

53. Please provide the HARP transaction file (.tra) that was generated in the HARP modeling.

Technical Area: Socioeconomics
Author: Amanda Stennick

BACKGROUND

The AFC (page 6.10-13) states that the project site will be annexed to the North County Fire Protection District (NCFPD) and that it has agreed to provide fire protection and emergency medical services to the project site upon annexation.

DATA REQUEST

54. For staff to do an analysis of the potential socioeconomic impacts of the Orange Grove project, please provide the following information.

    a. A letter of intent or equivalent from the fire chief indicating that the NCFPD will respond to medical emergencies (other than as described in Data Request #3) for the life of the project and has the staff and equipment necessary to properly respond.

    b. A letter from the NCFPD describing the potential impacts from the increased demand for services to existing resources and infrastructure, and the fiscal impact of imposing additional fire protection responsibility to the project site.

BACKGROUND

The Orange Grove AFC states that the proposed annexation would include the project parcel and additional parcels owned by SDG&E and Gregory Canyon Landfill. The AFC does not state why the annexation of these “additional parcels” would be necessary or would be related to the construction and operation of the proposed project.

DATA REQUEST

55. For staff to do an analysis of the entire project, please provide the following information.

    a. Clarify the reasons for the annexation of the additional parcels and whether they would be required for project construction and/or operation.

    b. The Assessor Parcel Numbers of all parcels proposed for annexation.

    c. A map that shows the project parcel and all the proposed annexation parcels.

BACKGROUND

As stated on page 6.10-13 of the AFC, Mercy Ambulance is the primary ambulance service for the project area and provides two paramedics to the Pala Fire Department (PFD) in addition to the two paramedics that are part of the PFD staff.

DATA REQUEST

56. Please provide a letter of intent or equivalent from the PFD indicating that the department will respond to medical emergencies for the life of the project and has the staff and equipment necessary to properly respond.

Technical Area: Soil and Water Resources
Author: Cheryl Closson

Erosion and Flood Control

BACKGROUND

To determine the potential impacts to soil and water resources from the construction and operation of the Orange Grove project, the Energy Commission requires a draft Drainage, Erosion and Sediment Control Plan (DESCP). The draft DESCP is separate from any Construction and Industrial Storm Water Pollution Prevention Plans (SWPPP) or municipal storm water plan requirements. Once the project is approved, the draft DESCP would be required to be updated and revised as the project moves from the preliminary to final design phases, on through to construction and operation of the facility. In addition, the DESCP submitted prior to site mobilization would be required to be designed and sealed by a professional engineer/erosion control specialist.

DATA REQUEST

57. Please provide a draft DESCP that contains elements "A" through "I" below outlining the site management activities and erosion/sediment control Best Management Practices (BMPs) to be implemented during site mobilization, grading, construction, and operation of the proposed project. The level of detail in the draft DESCP should be commensurate with the current level of planning for site grading and drainage. Please provide all conceptual erosion control information for those phases of construction and operation that have been developed or provide a statement identifying when such information will be available.

    a. Vicinity Map – Provide a map(s) at a minimum scale 1"=100' indicating the location of all project elements, including depictions of all significant geographic features including swales, storm drains, and sensitive areas.

    b. Site Delineation – Identify all areas subject to soil disturbance (i.e., project site, lay down areas, all linear facilities, water pick-up areas, landscaping areas, and any other project elements) and show boundary lines of all construction/demolition areas and the location of all existing and proposed structures, pipelines, roads, and drainage facilities.

    c. Watercourses and Critical Areas – Show the location of all nearby watercourses including swales, storm drains, and drainage ditches. Indicate the proximity of those features to the project construction, laydown, and landscape areas, and all transmission and pipeline construction corridors.

    d. Drainage Map – Provide a topographic site map(s) at a minimum scale 1"=100' showing all existing, interim and proposed drainage systems and drainage area

boundaries. On the map, spot elevations are required where relatively flat conditions exist. The spot elevations and contours should be extended off-site for a minimum distance of 100 feet in flat terrain.

e. Narrative Discussion of Project Site Drainage – Include a narrative discussion of the drainage management measures to be taken to protect the site and downstream facilities. The narrative should include the summary pages from the hydraulic analysis prepared by a professional engineer/erosion control specialist. The narrative should state the watershed size(s) (in acres) that was used in the calculation of drainage control measures, and include discussions justifying selection of the control measures to be used. Information from the hydraulic analysis should also be provided to support the selection of BMPs and structural controls to divert off-site and on-site drainage around or through the project construction and laydown area, as well as post-construction and operation areas.

f. Clearing and Grading Plans – Identify all areas to be cleared of vegetation and areas to be preserved. Provide elevations, slopes, locations, and extent of all proposed grading using contours, cross sections or other means and include locations of any disposal areas, fills, or other special features. Illustrate existing and proposed topography tying in proposed contours with existing topography.

g. Clearing and Grading Narrative – Include a table that identifies all of the following: all project elements where material will be excavated or fill added; the type and quantities of material to be excavated or filled for each element; whether the excavation or fill is temporary or permanent; and the amount of material to be imported or exported.

h. Construction Best Management Practices Plan – Identify on the topographic site map(s) the location of the site-specific BMPs to be employed during each phase of construction (initial grading, project element excavation and construction, and final grading/stabilization). The BMPs identified should include measures designed to prevent wind and water erosion in areas with existing soil contamination. Any treatment BMPs used during construction should also allow for testing of stormwater runoff prior to discharge to a receiving water.

i. BMP Narrative – Provide a narrative discussion on the selection, location, timing, and maintenance schedule for all erosion and sediment control BMPs to be used prior to initial grading, during project element excavation and construction, at final grading/stabilization, and for post-construction. A narrative discussion with supporting calculations should also be included addressing any project specific BMPs. Separate BMP implementation schedules should be provided for each project element for each phase of construction. The maintenance schedule should include post-construction maintenance of structural control BMPs, or a statement when such information will be available.

Water Supply and Use

BACKGROUND

The Orange Grove Project Application for Certification (AFC) states that the construction contractor will be responsible for the project water supply during construction. The AFC gives estimates of peak and average water use during construction to be approximately 5,000 gallons per day (gpd) and 500 gpd, respectively, but does not provide support for the estimates given. The application further states that the contractor will be required to obtain the construction water supply from an existing permitted source, and gives as an example water purchased from the Rainbow Municipal Water District (RMWD) and loaded at an existing hydrant "as is customary for construction projects"(information from AFC pages 6.5-10 and 11). While the project AFC gives RMWD as an example of a source for the construction water, it does not evaluate the availability of the potential construction water source or other sources (including recycled water), nor does it adequately evaluate the effects of project construction demand on the RMWD water source (or other sources) and other users of the construction water sources. Staff requires additional information on project construction water use requirements, source(s), and availability in order to adequately assess project impacts.

DATA REQUEST

58. Please provide additional information on project construction water use requirements, water sources, and availability. This additional information should include a table detailing estimated construction water needs for all major construction activities and project elements (such as main site grading, gas pipeline trenching, etc.) and address sources of construction water, availability of water, as well as any cumulative water supply/demand impacts that may occur.

59. In addition, please provide an evaluation of the applicability and availability of non-potable water (such as recycled or impaired water) for project construction use.

BACKGROUND

Page 6.5-6 of the project AFC states that the Orange Grove facility site is located in the Rainbow Municipal Water District (RMWD) but RMWD "is currently not capable of providing a feasible water supply to the project". Consequently, the project has entered into an agreement with the Fallbrook Public Utility District (FPUD) for supply of potable water for non-cooling process uses. Staff seeks confirmation that the RMWD is in agreement with this arrangement, and that the proposed water supply agreement with FPUD complies with RMWD service authorities and boundaries.

DATA REQUEST

60. Please provide additional information and confirmation that the proposed potable water agreement with FPUD is consistent and/or complies with RMWD water supply authorities and boundaries.

Process Wastewater

BACKGROUND

The process wastewater generation and management information provided in the project AFC appears inconsistent. Table 2.7-1 on page 2-20 of the project AFC identifies the plant operation process wastewater streams and identifies all but one wastestream to have negligible generation volumes, and yet identifies facility washdown drains as generating 35 gallons per minute (gpm) of wastewater during short-term peak conditions (short-term is not defined in the table). Page 2-21 states that the plant will essentially function as a zero liquid discharge (ZLD) facility because it will recycle all its wastewater streams "except for a few hundred gallons per month" of wastewater generated from drains where water could potentially contain oil or grease. While Table 6.14-4 in the AFC Waste Management section states that the fuel gas system will generate 30 gallons per month of oily water. Staff needs clarification on the process wastewater volumes to be generated by the project, as well as additional information on wastewater management. Staff also need clarification on the project's interpretation of ZLD technology and its comparison to the proposed project wastewater management, and whether the project considered use of oil/water separators to further minimize the volume of oily water requiring offsite management or disposal.

DATA REQUEST

61. Please provide a revised Table 2.7-1 (Plant Operation Process Wastewater Streams) that more clearly identifies the volumes of wastewater expected, and clarifies the apparent differences in wastestream volumes given in other sections of the project AFC. In addition to Table 2.7-1, please provide revised information as necessary to address any changes or revisions to process wastewater information or discussions found in other sections of the project AFC.

62. Please provide additional information and explanation to support the page 2-21 statement that the project's proposed reverse osmosis (RO) water treatment system and recycling of wastewaters "essentially function as a zero liquid discharge technology in conformance with the CEC's 2003 Integrated Energy Policy Report policy for reducing the use of fresh water".

63. Please provide additional information and discussion on the applicability of using oil/water separators in managing project wastewaters and whether or not use of oil/water separators was considered for project wastewater management. The requested information should include justification for not using oil/water separators

to minimize the volumes of wastewater requiring offsite management, or provide revisions to applicable project parameters to include use of oil/water separators to manage wastewaters potentially containing oil and/or grease.

Gas Pipeline Construction

BACKGROUND

Page 2-37 of the project AFC states that a rock trencher will be used to excavate the gas pipeline trench in the mountainous terrain where bedrock is present at shallow depth. However, no further information is provided on the rock trenching activity. Staff requires additional information on the proposed rock trenching in order to adequately assess potential impacts of the activity.

DATA REQUEST

64. Please provide additional information on the proposed rock trenching to be employed during gas pipeline construction. The requested information should include detailed discussions and documentation addressing all of the following: the method of trench construction; equipment to be used (size, model, weight, if this detail is available); the clearance requirements necessary for use of the equipment; water requirements; safety measures; erosion and sediment control BMPs; and post-trenching site remediation plans.

Note: The proposed rock trenching and associated erosion and sediment control considerations should also be addressed in the DESCP requested in Data Request Number 1 above.

Technical Area: Transmission System Engineering
Author: Ajoy Guha, P. E. and Mark Hesters

INTRODUCTION

Staff needs to determine the system reliability impacts of the project interconnection and to identify the interconnection facilities including downstream facilities needed to support the reliable interconnection of the proposed Orange Grove Project (OGP). The interconnection must comply with the Utility Reliability and Planning Criteria, North American Electric Reliability Council (NERC) Planning Standards, NERC/Western Electricity Coordinating Council (WECC) Planning Standards, and California Independent System Operator (California ISO) Planning Standards. In addition the California Environmental Quality Act (CEQA) requires the identification and description of the "Direct and indirect significant effects of the project on the environment." For the compliance with planning and reliability standards and the identification of indirect or downstream transmission impacts, staff relies on the System Impact Study (SIS) and Facilities Study (FS) as well as review of these studies by the agencies responsible for insuring the interconnecting grid meets reliability standards, in this case, the SDG&E and California ISO. The studies analyze the effect of the proposed project on the ability of the transmission network to meet reliability standards. When the studies determine that the project will cause the transmission to violate reliability requirements the potential mitigation or upgrades required to bring the system into compliance are identified. The mitigation measures often include modification and construction of downstream transmission facilities. The CEQA requires environmental analysis of any downstream facilities for potential indirect impacts of the proposed project.

BACKGROUND

The description of the SDG&E 69 kV Pala substation including major equipment and their ratings is incomplete as provided in the AFC and the FS dated May 2, 2008.

DATA REQUESTS

65. Provide pre and post-project electrical one-line diagrams of the SDG&E 69 kV Pala substation for interconnection of the proposed new UG 69 kV line showing all transmission outlets, breakers, buses, disconnect switches and their respective ratings.

BACKGROUND

For the addition of the OGP, the SIS dated October 22, 2007 and the FS dated May 2, 2008 determined that the following mitigation measures are required to eliminate overload criteria violations found in the downstream facilities under contingency conditions:

a. Reconductoring the SDG&E Transmission line (TL) 698E, Pala-Monserate Tap 69 kV line with 636 kcmil ACSS conductor and replacement of the Pala getaways with 3,000 kcmil copper conductor.

b. Reconductoring the SDG&E TL 698B, Monserate-Monserate Tap 69 kV line with 636 kcmil ACSS conductor and replacement of the Monserate getaways with 3,000 kcmil copper conductor.

CEQA requires environmental analysis of any downstream facilities for potential indirect impacts of the proposed OGP.

DATA REQUESTS

66. Submit a short analysis describing the environmental impacts for the reconductoring of the SDG&E 698E, Pala-Monserate Tap 69 kV line with 636 kcmil ACSS conductor and proposed mitigation measures. Alternately, if this reconductoring project is an approved SDG&E/ California ISO project under their annual transmission plan, provide a letter from the SDG&E or California ISO confirming the project number and year of the annual plan.

67. Submit a short analysis describing the environmental impacts for the reconductoring of the SDG&E TL 698B, Monserate-Monserate Tap 69 kV line with 636 kcmil ACSS conductor and proposed mitigation measures. Alternately, if this reconductoring project is an approved SDG&E/ California ISO project under their annual transmission plan, provide a letter from the SDG&E or California ISO confirming the project number and year of the annual plan.

Technical Area: Waste Management
Author: Cheryl Closson

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)

BACKGROUND

The Phase I ESA submitted as part of the project Application for Certification (AFC) addresses the main project site and some of the San Diego Gas and Electric (SDG&E) property adjacent to the main project site, but does not address the developed property along the gas pipeline. A Phase I ESA, or equivalent information, is needed for the property along the gas pipeline route to determine if past or present uses of the property have caused, or threaten to cause, contamination that might impact, or be impacted by, construction and operation of the project's gas pipeline.

DATA REQUEST

68. Please provide a Phase I ESA, or equivalent information, addressing the past and present uses of property along, adjacent to, or in proximity of the project's gas pipeline route. The requested information should include an evaluation addressing whether or not past or present site conditions may have resulted in contamination, or potential contamination, that could impact construction and operation of the gas pipeline.

BACKGROUND

The Phase I ESA submitted as part of the project AFC states that the SDG&E storage area was not inspected due to inability to access the site. However, the Phase I ESA notes on interviews with the property owner's representative indicate that the SDG&E caretaker has vacated the property. According to the Phase I ESA, the SDG&E storage area has been used for storage and as a residence for over ten years, and includes a septic tank and leach field associated with the residence. However, the location of the septic tank is not known and was not investigated.

Staff notes that the construction layout plans and drainage drawings in the AFC Appendix 2-A indicate that project construction will use the SDG&E storage area, as well as the property between the storage area and the main project site, for temporary construction buildings and laydown areas. Therefore, staff requires additional information on the condition of the SDG&E storage area site, as well as the location of the septic tank and leach field, in order to assess the potential for contamination or other conditions that may impact, or be impacted by, project construction activities.

DATA REQUEST

69. Please conduct a Phase I ESA site inspection and investigation of the SDG&E storage area, surrounding property, and related septic/leach field system. The Phase I ESA, or equivalent information, should address all of the following:

    a. An evaluation of the wastes and possible hazardous substance releases associated with the residence, storage structures, and any abandoned vehicles or dump sites found at and around the site. This evaluation shall include a visual inspection of the structures and grounds around the structures, vehicles, and any associated facilities.

    b. An evaluation of the potential for asbestos, lead-based paint, mercury (from abandoned vehicles, switches, etc.), or other hazardous substance releases in the area of the storage site or dump/refuse areas.

    c. Identification of the location and condition of the existing septic tank and leach field associated with storage area residence.

    d. Recommendations for any additional site characterization that may be necessary to assess potential contamination or areas of concern that may be identified.

SOIL AND DEBRIS DISPOSAL

BACKGROUND

Page 2-38 of the project AFC states that gas pipeline construction will generate approximately 400 cubic yards of additional rubble and debris that will be hauled offsite for recycling or disposal. It is unclear to staff whether or not this additional debris was included in the waste generation and disposal information provided in AFC section 6.14, Waste Management.

DATA REQUEST

70. Please clarify waste generation and management information as necessary to address pipeline construction debris generation and disposal, including information on debris management, anticipated disposal sites, and transport of the debris to disposal sites.

RECYCLING FACILITIES

BACKGROUND

The Orange Grove project proposes to recycle both non-hazardous and hazardous wastes as much as possible and also proposes to implement a waste minimization program. Staff fully supports these efforts. However, it appears that the project AFC only provides information on potential Class I and III disposal facilities and does not list

the potential recycling facilities to be used. Additional information is needed on the location, capacity, materials accepted, and regulatory status of recycling facilities to be used to manage project recyclable materials and wastes.

DATA REQUEST

71. Please provide a summary table of information on recycling facilities that may be used to manage project recyclable materials and wastes. At a minimum, please include the following information for each facility: facility location; distance from project site; capacity, materials accepted, and acceptance limits (if any); operation parameters; and regulatory status.

Technical Area: Worker Safety/Fire Protection
Author: Dr. Alvin Greenberg

BACKGROUND

All power plants licensed by the Energy Commission have on-site fire detection and suppression systems and also rely on a response from off-site fire departments for fires, EMS, and as a first-response hazardous to materials spills. The AFC mentions that the project site will be annexed to the North County Fire Protection District and that the District has agreed to provide fire, EMS, and spill response to the power plant. The AFC also mentions that the District is equipped to handle these three types of emergencies. Subsequent to the printing and filing of the AFC, the applicant has indicated that the project site may not be annexed to the North County Fire Protection District and that other arrangements for off-site emergency response will be made. In order to properly evaluate compliance with all LORS, staff must know the details of off-site emergency response and have written assurances that an off-site fire department will provide fire, emergency medial, and hazardous materials spill response to the site.

Additionally, all power plants licensed by the Energy Commission have more than one access point to the power plant site. This is sound fire safety procedure and allows for fire department vehicles and personal to access the site should the main gate be blocked. A review of the site layout maps in the AFC shows two access points to the power plant site but the AFC lacks a narrative description of these access points' ability to accommodate fire trucks and if the fire department will have keys, codes, or other means of swiftly gaining access through these gates in an emergency. In order to properly assess fire protection for the proposed power plant, staff needs to know these details.

DATA REQUESTS

72. Please provide a detailed statement that off-site fire, EMS, and spill response to the project site will be provided, identify the fire department that will respond, and the date it has agreed to provide these services. Include a letter from the Fire Department Chief or Fire Marshall indicating that the department is willing and able to respond to emergencies and has the staff and equipment necessary to properly respond.

73. Please identify all access points for emergency vehicles, state whether the entrance will be wide enough to accommodate fire trucks, and include the method of gate opening and securing available to the fire department.