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Filed For: SV RNO Property Owner 1 LLC

In accordance with NRS Chapter 719,
this filing has been electronically signed and filed
by: /s Dallas H

By electronically filing the document(s),
the filer attests to the authenticity of the electronic signature(s) contained therein.

This filing has been electronically filed and deemed to be signed by an authorized agent or
representative of the signer(s) and
SV RNO Property Owner 1 LLC

FILED WITH THE PUBLIC UTILITIES COMMISSION OF NEVADA - 4/20/2026

Davison Van Cleve PC
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4675 W Teco Ave., Suite 240
Las Vegas, Nevada 89118

April 20, 2026

Trisha Osborne
Assistant Commission Secretary
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701

RE: Application of SV RNO Property Owner 1 LLC for a Permit to Construct the Proposed South Valley Generation Facility in Storey County, Nevada, under the provisions of the Utility Environmental Protection Act.
Docket 26-04_____

Dear Ms. Osborne:

Please find enclosed the Application of SV RNO Property Owner 1 LLC for a Permit to Construct the Proposed South Valley Generation Facility in Storey County, Nevada, under the provisions of the Utility Environmental Protection Act.

If you have any questions regarding this filing, please do not hesitate to contact me.

Sincerely,

/s/ Dallas A. Harris
Dallas A. Harris
Nevada Bar No. 14708
4675 W. Teco Ave., Suite 240
Las Vegas, NV 89118
(909) 575-7320 (telephone)
dah@dvclaw.com

Of Attorneys for SV RNO Property Owner 1 LLC

Enclosure

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Application of SV RNO Property Owner 1 LLC for a Permit to Construct the Proposed South Valley Generation Facility in Storey County, Nevada, under the provisions of the Utility Environmental Protection Act.	**Docket No. 26-04___**

APPLICATION OF SV RNO PROPERTY OWNER 1 LLC FOR A PERMIT TO CONSTRUCT THE PROPOSED SOUTH VALLEY TEMPORARY POWER GENERATION FACILITY IN STOREY COUNTY, NEVADA, UNDER THE UTILITY ENVIRONMENTAL PROTECTION ACT

I. INTRODUCTION

Pursuant to Nevada Revised Statutes ("NRS") § 704.870(1) and Nevada Administrative Code ("NAC") 703.423, SV RNO Property Owner 1 LLC ("SV RNO" or "Applicant"), hereby files with the Public Utilities Commission of Nevada (the "Commission" or "PUCN") this Application for a Permit to Construct ("PTC" or "Application") the facilities described herein, located in Storey County, Nevada (the "Utility Facilities"), pursuant to the Utility Environmental Protection Act ("UEPA") set forth in NRS §§ 704.820 to 704.900. In support of this Application, the Applicant hereby submits the following information and evidence.

SV RNO Property Owner 1, LLC is a limited liability company engaged in the development, ownership, and operation of data center campus infrastructure near the Tahoe-Reno Industrial Center ("TRI Center"), located approximately 27 miles east of Reno in Storey County, Nevada. The TRI Center is one of Nevada's premier master-planned industrial parks and has attracted significant data center, technology, and industrial investment. Applicant proposes to install the South Valley Temporary Power Generation Facility (the "Project" or "Facility") to supply power to the South Valley data center campus located at 8990 USA Parkway, McCarran, Nevada 89437, on Storey County Assessor's Parcel Number ("APN") 004-171-25. The Project site is within an I-2 Heavy Industrial Zone and is consistent with the Storey County Master Plan

and TRI Center Master Plan land use designations. Applicant is not a public utility as defined by NRS § 704.020, but is seeking a UEPA PTC in connection with the construction of covered utility facilities at the Project site.

The Project consists of a 144 MW capable natural gas power generation system designed to supply electrical power exclusively for on-site consumption at the South Valley data center campus.

The generation facility comprises ninety (90) Jenbacher J420 natural gas-fueled engines (approximately 1.6 MW each), four (4) Volvo Penta Model TWD1683GE Tier 4 diesel-fueled black start engine gensets (1,370 kW each), forty (40) LNG holding tanks, two (2) dual-burner LNG vaporizers (26 MMBtu/hr each), fifty-three (53) medium voltage transformers, and ninety (90) selective catalytic reduction ("SCR") systems for NOx, CO, and VOC control. The facility will be operated and maintained by Aggreko, LLC; LNG delivery, storage, and vaporizing operations will be managed by Stabilis. The power generated by this system will be non-grid connected and will provide electricity exclusively to the on-site data center.

This temporary power system is required because data center growth is outpacing NV Energy's ability to supply power in new areas. The Project is expected to remain in operation for approximately two to three years until NV Energy can deliver permanent utility service to the site. A UEPA permit is required because the Project includes a new 144 MW capable power generation facility using natural gas-fired engines, which triggers UEPA permitting requirements under NRS §§ 704.820-704.900.

Applicant respectfully requests that the Commission approve this Application and issue a PTC for the Utility Facilities as further described herein.

II. INFORMATION REGARDING THE APPLICANT

SV RNO Property Owner 1, LLC is a limited liability company organized and existing under the laws of the State of Nevada. The Applicant's primary business purpose is the development, ownership, and operation of data center campus infrastructure, including all associated utility and support facilities required for data center operations at the TRI Center in Storey County, Nevada. The Applicant's principal place of business is located at 3300 East 1st Avenue, Denver, CO 80206.

All correspondence related to this Application should be sent to the undersigned Counsel and to the Applicant's general counsel representative, whose names and addresses are set forth below:

Counsel for Applicant:

Dallas A. Harris
Nevada Bar No. 14718
Davison Van Cleve, P.C.
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Las Vegas, Nevada 89118
Tel: (909) 575-7320
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And to:
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Applicant Contact / General Counsel:

Shalini Sharma
General Counsel
Fleet Data Centers
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Denver, Colorado 80209
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E-Mail: shalini.sharma@fleetdatacenters.com

III. RESPONSES TO REQUIRED DISCLOSURES

The information required by NAC 703.423 is provided as follows:

A. A Description of the Location of the Proposed Utility Facility, as Required by NRS § 704.870(1) and NAC § 703.423(1):

The Project is located in Storey County, Nevada, approximately 27 miles east of the City of Reno, near the Tahoe-Reno Industrial Center ("TRI Center"). The Project is situated on land identified by Storey County APNs 004-171-25 and 004-171-30, with a Project address of 8990 USA Parkway, McCarran, Nevada 89437. The entire Project area is privately owned and is situated within a Master Planned industrial park. The parcels front USA Parkway, a public dedicated roadway, which will serve as the primary access route to the Project site. The Project area is zoned I-2 Heavy Industrial Zone under Storey County Zoning Ordinance Chapter 17.35 and bears the land use designation of "Industrial" under the Storey County Master Plan. The TRI Center Master Plan authorizes development of electric generating facilities by entitlement pursuant to Storey County Zoning Ordinance Title 17 (§ 17.12.064). The power generation equipment footprint is contained within the South Valley data center campus fence line, occupying approximately 37.4 acres on privately owned land (7.3 acres generation facility, 0.3 acres access road, and 29.8 acres laydown and staging areas).

1. Regional Location Map

See Exhibits A and B.

2. Legal Description

See Exhibit C.

3. Site Plan and Construction Drawings

See Exhibits D and E.

B. A Description of the Proposed Utility Facility, as Required by NAC § 703.423(2):

1. Size and Nature of the Proposed Utility Facility

The Project consists of a natural gas-fueled electrical generating facility designed to supply power exclusively for on-site consumption at the South Valley data center campus.

(a) Temporary Power Generation Facility. The primary generation facility is a 144 MW capable temporary natural gas power generation system. Major equipment includes:

Ninety (90) Jenbacher J420 natural gas-fueled engines (approximately 2,146 bhp / 1.6 MW each); ninety (90) Selective Catalytic Reduction (SCR) systems for NOx, CO, and VOC control; four (4) Volvo Penta Model TWD1683GE Tier 4 diesel-fueled black start engine gensets (1,370 kW each); four (4) 1,240-gallon diesel tanks; forty (40) LNG holding tanks; two (2) LNG vaporizers with 26 MMBtu/hr dual burners each, and four (4) LNG delivery stations; fifty-three (53) medium voltage transformers (3.0 MVA each); fifty-three (53) medium voltage switchgear units; natural gas piping from vaporizers to engines; protection equipment; control and relay enclosures; security fencing (8-foot expanded metal perimeter fence); and all necessary appurtenances.

2. Natural Resources Used

Construction activities will require water for dust suppression, concrete mixing, and worker sanitation. Water for both construction and operations will be provided by the TRI Center water main located along USA Parkway, managed and operated by the Tahoe-Reno Industrial General Improvement District (TRI-GID). The estimated volume of water consumed is 2.1 acre-feet. Construction materials will include concrete, steel, aggregate rock base, copper grounding conductors, and standard electrical equipment. The temporary power facility will consume natural gas (delivered as LNG) as the primary fuel during operations.

3. Layout Diagrams

See Exhibit B.

4. Standard Site Plan and Drawings

See Exhibits D and E.

5. Renewable Energy Statement

The Project is not an electric generating plant that uses renewable energy as its primary source of energy.

C. A Summary of the Environmental Impact Studies Conducted in Connection with the Proposed Facility, as Required by NAC § 703.423(3) and NRS § 704.870(1):

A summary of environmental impacts is provided below for convenience and to capture the general findings of the UEPA Environmental Statement (the "Environmental Statement") prepared for the Project, which is attached as Exhibit F. The Environmental Statement was developed in accordance with the requirements of NRS §§ 704.820-704.900 and provides a thorough analysis of existing conditions, potential impacts, and mitigation measures for each environmental resource category.

1. Geology and Soils

The Project site is located near the TRI Center industrial park in Storey County, Nevada, in an area characterized by semi-arid terrain. The project area has been previously graded and leveled under existing Storey County grading permits issued for the South Valley data center campus development. Ground disturbance will be managed through implementation of BMPs consistent with the Project's SWPPP and applicable NDEP SAD permit requirements. No paleontologically sensitive formations are known to underlie the Project site; however, the Environmental Statement includes protocols for unanticipated discovery of paleontological resources. All construction will comply with applicable seismic codes.

2. Water Resources

A preliminary evaluation of Waters of the United States ("WOTUS") and wetland resources in the Project area has been conducted. The Project site is classified by FEMA as an "area of minimal flood hazard" and is not located within the 100-year flood zone. Groundwater depth at the Project site is well below the depth of any anticipated excavation or construction activity. A Nevada Construction Stormwater Permit (NPDES) will be obtained from NDEP prior to construction, and a SWPPP will be prepared and implemented to manage construction stormwater.

3. Air Quality and Climate

An Air Dispersion Modeling Analysis was prepared by BlueScape Environmental on behalf of SV RNO Property Owner 1, LLC, dated February 25, 2026, and submitted to the Nevada Division of Environmental Protection ("NDEP") Bureau of Air Pollution Control ("BAPC") in connection with the Project's Class I Operating Permit to Construct ("OPTC") application. The modeling analysis was conducted using the EPA-approved AERMOD model (version 24142) with the Lakes Environmental software platform, utilizing meteorological data from the Tracy Met Station (2019) and terrain data from USGS. The analysis evaluated compliance with Nevada Ambient Air Quality Standards ("NvAAQS") for PM2.5, PM10, NOx, NO2, SO2, VOC, CO, and ozone. Modeling results demonstrate that the Facility will not cause or contribute to an exceedance of the NAAQS or NvAAQS for any criteria pollutant, and that Project NO2 and PM10 emissions will not exceed applicable PSD increment thresholds. The nearest residential receptor is approximately 4.5 miles south of the Facility center. The Project site is in attainment for all criteria pollutants. Construction emissions will be temporary and managed through standard dust suppression BMPs required under the SAD permit. A Class I OPTC Air Permit will be obtained from NDEP/BAPC prior to operations.

4. Biological Resources

The Project site and immediate surroundings are characterized by Sagebrush and Invasive Annual Grassland habitat types, much of which has already been disturbed by industrial development and TRI Center infrastructure improvements. Pre-construction biological surveys will be conducted consistent with applicable regulatory requirements to identify the presence of any special-status plant or wildlife species. Construction activities will be preceded by a Worker Environmental Awareness Program ("WEAP") to sensitize construction personnel to the potential presence of special-status species and applicable avoidance and minimization measures. Nesting bird surveys will be conducted prior to and during construction in compliance with the Migratory Bird Treaty Act. Electrical infrastructure design will incorporate industry-standard avian safety features to minimize raptor electrocution risk. Clearing and grading will be limited to areas necessary for Project activities. Temporary exclusion fencing or flagging will be installed along the boundaries of construction zones to prevent encroachment onto adjacent undisturbed habitat.

5. Cultural Resources

An archaeological and cultural resources survey has been conducted for the Project area. No significant historic properties are known to be present within the Project Area of Potential Effect ("APE"). Unanticipated discovery protocols will be implemented in the event that cultural resources, human remains, or other artifacts are encountered during construction, consistent with NRS Chapter 383 and applicable state and tribal consultation requirements. The Project sponsor has conducted or will conduct consultation with the Nevada State Historic Preservation Office ("SHPO") and any interested Native American tribes prior to the initiation of ground-disturbing activities.

6. Land Use

The Project site is zoned I-2 Heavy Industrial Zone under Storey County Zoning Ordinance Chapter 17.35 and bears the land use designation of "Industrial" under the adopted (July 1, 1999)

Storey County Master Plan and TRI Center Master Plan. The TRI Center Master Plan authorizes development of electric generating facilities by entitlement. The Project is subject to the Development Agreement between Storey County and TRIC, the CC&Rs recorded February 19, 1999 as Document No. 84415 in the office of the Storey County Recorder, and the TRI Center Development Handbook. The Project is fully consistent with applicable land use designations and entitlements.

7. Transportation and Circulation

Access to the Project site will be via USA Parkway, a public dedicated roadway that fronts the project parcel, and local internal access roads near the TRI Center and data center campus. Construction activities will generate temporary increases in construction vehicle trips, primarily for delivery of equipment and materials. LNG delivery to the site will occur approximately 20 times per day during operations using a 24-hour delivery window. A traffic management plan will be implemented during construction to minimize disruption to local roadways. All construction vehicle routes will comply with applicable weight limit and routing requirements for Storey County roadways.

8. Visual Resources

The Project is located in an established heavy industrial zone near the TRI Center. The surrounding landscape is characterized by existing industrial facilities, data center campuses, and undeveloped mountainous terrain. The Project does not lie within any designated scenic corridor, viewshed, or visually sensitive area. The temporary nature of the power generation equipment, and its location within the existing data center fence line, will limit its visual prominence. Lighting for the power generation site will be directed downward and shielded to minimize off-site light spillage. Overall visual impacts are expected to be minor given the established industrial setting.

9. Noise

A noise impact assessment was conducted for the Project using dBmap software (v1.7.4), applying ISO 9613-2:2024 methodology and modeling 97 point sources representing the J420 engines and supporting equipment. Manufacturer-provided sound data indicate that individual gas-fired generators produce sound pressure levels of approximately 85 to 90 dBA at a distance of 1 meter from the unit. Noise modeling results indicate that predicted operational noise levels attenuate to below 55 dB(A) at 660 feet with all 90 J420 engines running. Construction noise will be temporary and limited to daytime hours consistent with applicable Storey County noise ordinance requirements. Operational noise from the temporary power facility will be continuously generated during the 2-3 year operational period; however, given the industrial setting and distances to the nearest residential uses (approximately 4.5 miles), noise impacts at sensitive receptors are expected to be within acceptable limits.

10. Waste Management and Hazardous Materials

The primary waste stream during operations will consist of non-hazardous solid waste including rags, broken metal, machine parts, defective or broken electrical materials, empty containers, and typical site refuse, all of which will be disposed of in an appropriately licensed landfill or recycled where practicable. Limited quantities of hazardous materials will be used onsite for operations and maintenance activities, including oils, diesel fuel, lubricants, solvents, coolants, hydraulic fluids, and welding materials. All diesel fuel tanks are double-walled with built-in secondary containment. Transformer containment areas will be lined with an impermeable membrane and include a drain with a normally closed valve, providing secondary containment equal to 110 percent of the transformer oil volume plus the volume of stormwater for a 25-year, 24-hour rainfall event. Spill prevention, control, and countermeasure ("SPCC") plans will be prepared and implemented. No hazardous waste is anticipated to be generated in reportable quantities.

11. Socioeconomics

Construction of the Project is expected to generate significant temporary employment for qualified electrical, mechanical, and civil construction workers in the region. Peak construction workforce is estimated at 20 workers, with an average construction workforce of 15 over an estimated construction period of approximately 6 to 8 months. Local businesses and suppliers within the region will benefit from construction spending. Long-term operations and maintenance of the temporary power facility will require approximately five permanent positions, staffed by a team of qualified technicians operated and managed by Aggreko, LLC. Development of the Fleet South Valley data center campus, which the Project serves, represents a significant long-term economic investment in Storey County, including substantial property tax revenues, permanent employment, and economic diversification consistent with the county's industrial growth objectives.

D. A Description of the Probable Residual Effect on the Surrounding Area if the Alternate Locations Were Used, as Required by NAC § 703.423(4):

Applicant evaluated potential alternatives for the placement of the temporary power generation facility within and near the South Valley data center campus. Because the Project is a temporary power system located within the South Valley data center campus boundary to provide power exclusively and directly to that data center, no alternative locations outside the campus boundary were feasible. The selected location within the campus fence line minimizes the length of power transmission cables, eliminates the need for additional off-site infrastructure, and is central to the loads being served. The site has already been graded and leveled under existing Storey County grading permits.

The no-build alternative would eliminate the Project entirely. This alternative fails to meet the Project's purpose and need because it would prevent SV RNO from obtaining the temporary

power supply required to serve the data center during the period before NV Energy's permanent utility infrastructure is in service.

Based on these considerations, Applicant submits that the selected Project site and configuration represent a reasonable balance of engineering, reliability, environmental, and land use factors.

E. Proof of Public Notice, as Required by NRS § 704.870(4) and NAC § 703.423(5):

See Exhibit G for the Public Notice and Exhibit H for the Proof of Publication, respectively.

F. Proof of Submittal of the Application to the Nevada State Clearinghouse, as Required by NAC § 703.423(6):

A copy of this Application is being served on the Nevada State Clearinghouse, Division of State Lands. See Exhibit I, Proof of Service.

G. A Description of the Probable Effect of the Proposed Utility Facility on the Environment, as Required by NAC § 703.423(7):

1.(a) Environmental Impacts

Construction impacts will be primarily temporary, localized, and managed through implementation of BMPs and applicable permit conditions. Ground disturbance at the project area, which has been previously graded under existing permits, will be minor. Construction will generate temporary increases in air emissions from equipment exhaust and fugitive dust, which will be managed through NDEP SAD permit requirements. Temporary noise increases will occur during daytime construction hours. Stormwater will be managed pursuant to an NPDES Construction Stormwater Permit and SWPPP.

Once construction is complete, the power generation facility will operate continuously during the 2-3 year operational period. Operational impacts will include continuous noise from the generators, LNG delivery truck traffic (approximately 20 trips per day on a 24-hour basis), and air

emissions managed under the NDEP Class I OPTC air permit. Air dispersion modeling demonstrates attainment with all NvAAQS at all receptor locations, with the nearest residence approximately 4.5 miles from the Facility. A full assessment of environmental impacts is provided in the Environmental Statement attached as Exhibit F.

H. The Need to Ensure Reliable Service, as Required by NAC § 703.423(8):

The Project is necessary to provide reliable electrical power to the South Valley data center campus during the period before NV Energy can deliver permanent utility service to the site. Data center growth in the TRI Center is outpacing the pace at which NV Energy can build permanent infrastructure to serve new large industrial loads. Without the temporary power facility, SV RNO would be unable to activate and operate its data center, delaying a significant economic investment in Storey County and the broader Nevada economy.

The Project has been designed in accordance with applicable industry standards and NV Energy specifications to ensure system reliability and power quality. The temporary power system will be operated and maintained by Aggreko, LLC, using qualified technicians and established maintenance protocols to ensure continuous and reliable operation during the 2-3 year interim period.

I. The Relationship Between the Need to Ensure Reliable Service and the Effect on the Environment, as Required by NAC § 703.423(9):

The Project is a time-limited, project-critical infrastructure necessary to supply power to the South Valley data center during the period before NV Energy can deliver permanent utility service. Environmental impacts associated with the Project are primarily temporary in nature, limited to the construction period, and manageable through implementation of the engineering controls, BMPs, and permit conditions described in the Environmental Statement. Operational impacts, including air emissions and noise, are within established regulatory thresholds as

demonstrated by the air dispersion modeling analysis and noise impact assessment conducted for the Project.

The Facility is sited in an established I-2 Heavy Industrial zone near the TRI Center, far from sensitive residential and institutional receptors. The nearest residence is approximately 4.5 miles from the Facility. The benefits of the Project are substantial: enabling operation of a large-scale data center generating significant local employment during construction and operations, producing meaningful property tax revenues for Storey County, and supporting economic diversification in the TRI Center consistent with the county's long-term industrial development objectives. These public benefits clearly justify any adverse environmental effects, which have been mitigated to the extent practicable and are consistent with applicable regulatory standards.

J. An Explanation of Why the Location and Design of the Proposed Utility Facility Will Produce a Minimum Adverse Effect on the Environment, as Required by NAC § 703.423(10):

The selected Project site produces minimum adverse effects on the environment for the following reasons:

First, the Temporary Power Generation Facility is located entirely within the South Valley data center campus, which is situated near the TRI Center, a Master Planned I-2 Heavy Industrial zone. The surrounding area consists primarily of existing industrial facilities and undeveloped mountainous terrain. Sensitive land uses, including residences, are located at a distance of approximately 4.5 miles from the Facility.

Second, the substation area was previously graded and leveled under existing Storey County permits, significantly reducing the incremental ground disturbance associated with the Project. The temporary power generation equipment is largely mobile and requires minimal site preparation.

Fourth, the Project will implement a comprehensive suite of environmental controls during construction and operations, including BMPs for stormwater management, dust suppression, hazardous materials handling, and waste management, together with all conditions required by applicable NDEP and Storey County permits.

Fifth, the temporary nature of the power generation facility, which is expected to be removed after approximately 2-3 years when permanent NV Energy service is available, further minimizes long-term environmental effects.

K. A List of the Approvals of Any Other Governmental Agency Required Before Construction of the Proposed Utility Facility May Begin, as Required by NAC § 703.423(11):

The following table identifies the permits and approvals required for the Project, the issuing agency, and the expected completion date:

Permit	Issuing Authority	Expected Date
Surface Area Disturbance (SAD) Permit	Nevada Department of Environmental Protection (NDEP), Bureau of Air Pollution Control (BAPC)	Q2 2026
Nevada Construction Stormwater Permit (NPDES)	NDEP	Q1 2026
Class 1 OPTC Air Permit	NDEP	Q4 2026
Storey County Building Permit	Storey County	Q2 2026

Applicant commits that all applicable permits and approvals will be submitted to the Commission in response to its UEPA letter of compliance, consistent with NAC 703.423 and NRS 704.870 requirements.

L. A Statement of the Extent to Which the Proposed Utility Facility Will Serve the Public Interest, as Required by NAC § 703.423(12):

(a) Economic Benefits

The Project serves the public interest by enabling SV RNO to commence data center operations, representing a substantial capital investment in Storey County, Nevada. Construction of the Project will generate temporary employment for qualified electrical, mechanical, and civil workers in the region, with a peak construction workforce of 20 workers and an average of 15 over a construction period of approximately 6 to 8 months. Local businesses and suppliers within the region will benefit from construction spending. Long-term operations and maintenance of the temporary power facility will require approximately five permanent positions. Operations and maintenance of both the data center and associated utility infrastructure will produce sustained employment opportunities, property tax revenues for Storey County, and economic diversification consistent with the county's industrial growth strategy within the TRI Center.

(b) Probable Effect on Environment

Environmental impacts associated with the Project are primarily temporary in nature, confined to the construction period, and limited in geographic extent to the Project site within the established TRI Center industrial park. Operational air quality impacts have been demonstrated through air dispersion modeling to be within all applicable NvAAQS standards at all receptor locations. Operational noise impacts, while continuous during the 2-3 year operational period, are managed through the industrial setting and distance to sensitive receptors. No cumulative adverse environmental effects are anticipated that cannot be mitigated through the application of standard BMPs and permit conditions.

(c) Probable Effect on Public Health, Safety, and Welfare

The Project will be designed, constructed, and operated in full compliance with all applicable federal, state, and local health, safety, and environmental requirements. No unmitigated adverse impacts to public health, safety, or welfare are anticipated. Construction hazards will be managed through comprehensive health and safety plans adopted by SV RNO Property Owner 1,

LLC and applicable contractors. The power generation facility will be secured with 8-foot expanded metal perimeter fencing and staffed by qualified Aggreko operations personnel. The surrounding data center campus is staffed 24/7 and equipped with a perimeter security system. LNG delivery and storage will comply with applicable NFPA 59A, ASME, API 620, and CGA-341 standards. Nevada and Storey County residents will benefit from the substantial economic development, employment, and tax revenues generated by the Project and the South Valley data center it serves.

IV. CONCLUSION

In support of this Application, Applicant submits the following Exhibits:

Exhibit A: Project Location Map

Exhibit B: Facilities Layout – Existing and Proposed (Equipment Layout – Aggreko/Stabilis)

Exhibit C: Survey and Legal Description of the Property

Exhibit D: Site Plan and Civil Construction Drawings (EWP Draft)

Exhibit E: Project Boundary and Drainage Plans

Exhibit F: UEPA Environmental Statement

Exhibit G: Public Notice

Exhibit H: Proof of Publication

Exhibit I: Proof of Service

This Application, along with its supporting documents, provides a comprehensive overview of the proposed Project. The included exhibits are as follows: Exhibit A (Project Location Map), Exhibit B (Facilities Layout), Exhibit C (Survey and Legal Description of the Property), Exhibit D (Site Plan and Civil Construction Drawings), Exhibit E (Project Boundary and Drainage Plans), Exhibit F (UEPA Environmental Statement), Exhibit G (Public Notice), Exhibit H (Proof of Publication), and Exhibit I (Proof of Service). These documents collectively

ensure that all necessary information is available for the Commission's evaluation and approval process.

The public notice requirements have been met, with proof of publication provided for a summary of this Application. This notice has been disseminated in newspapers circulated in the Project area, adhering to the requirements outlined in NRS § 704.870(4)(b) and NAC § 703.423(5) (refer to Exhibit H for details).

Additionally, proof of service confirms that a copy of this Application has been submitted to the clerk of each local government impacted by the Project's location, as stipulated by NRS § 704.870(4)(a) (see Exhibit I for documentation).

The State Environmental Commission has been designated as a party to this proceeding according to NRS § 704.885(1)(b). A copy of this Application has been served on the Commission concurrently with this filing, in compliance with NRS § 704.870(3) (see Exhibit I for the Certificate of Service).

Dated this 20th day of April, 2026.

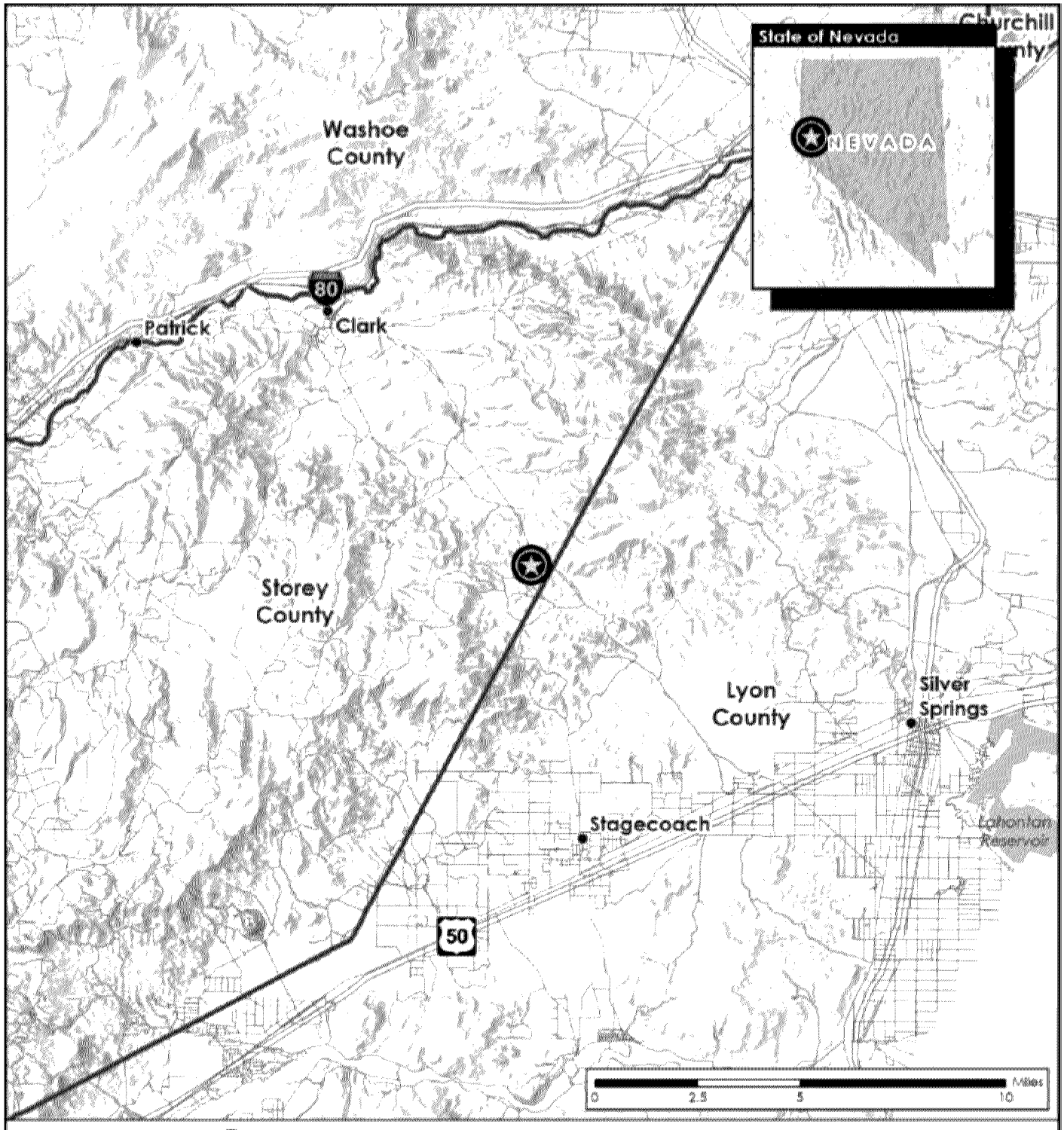
Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Dallas A. Harris
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Exhibit A



Legend

Scale = 1:250,000

Created: 2/11/2026

Proposed Project Site

City

Highway

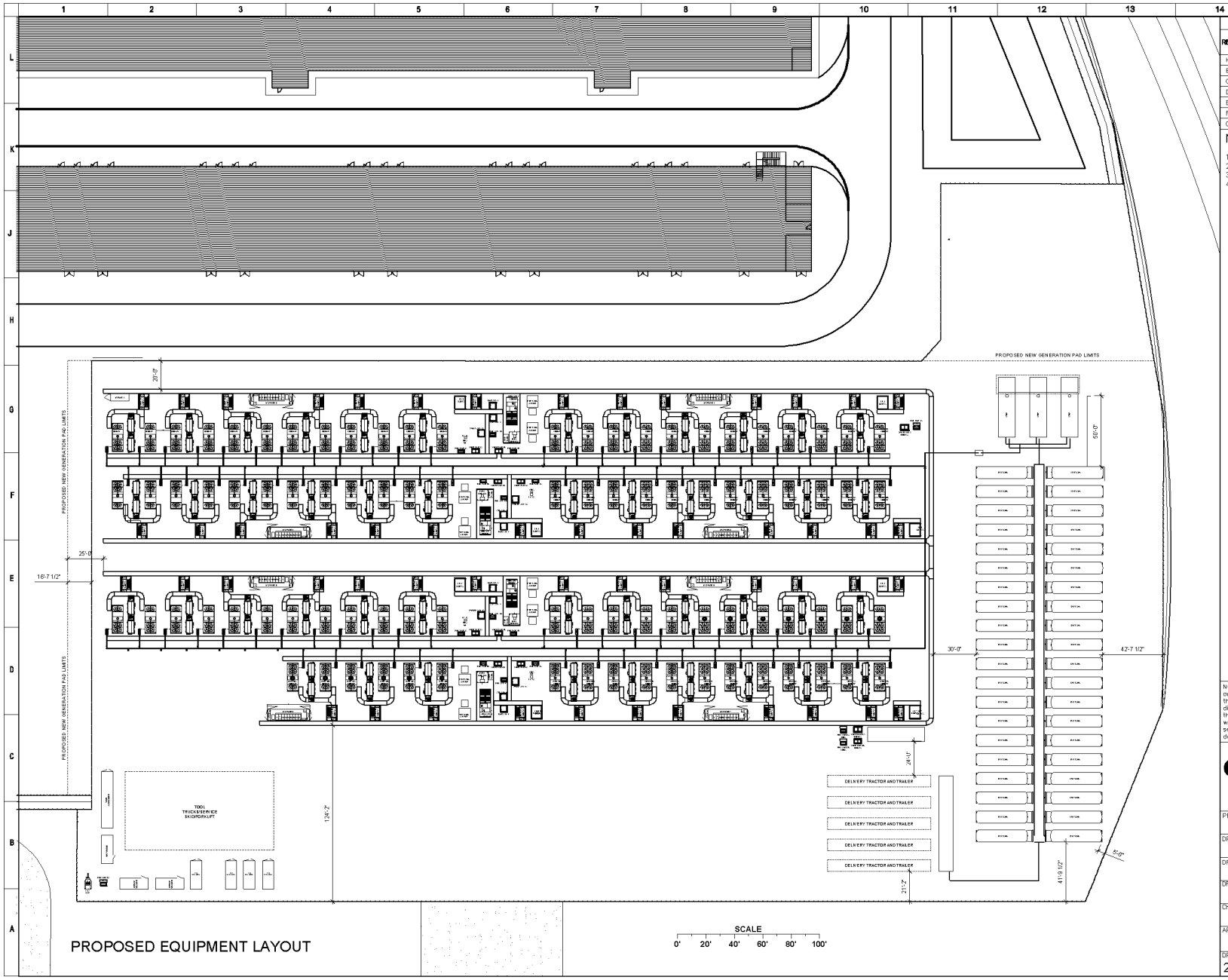
County Boundary

Bureau of Land Management (BLM)

N

PANORAMA

Exhibit B



PROPOSED EQUIPMENT LAYOUT

DO NOT SCALE - IF IN DOUBT - ASK

REV	DWN BY	CHK BY	APP BY	DESCRIPTION	DATE
H	EJD	STM		ISSUED FOR PERMITTING	12/19/25
B	MPM	CC		REVISED LAYOUT	10/20/25
C	MPM	STM		REVISED LAYOUT	11/7/25
D	MPM	STM		REVISED LAYOUT	11/13/25
E	MPM	DML		REVISED LAYOUT	11/24/25
F	MPM	STM		REVISED LAYOUT	12/5/25
G	MPM	EJD		REVISED LAYOUT	12/12/25

NOTES:

1. GREEN = FUEL HOSE / PIPING
2. RED = LV CABLE (480V)
3. ORANGE = MV CABLE (35KV)
4. FUEL GAS HOSE / PIPING SHOWN IN LAYOUT IS CONCEPTUAL ONLY. ACTUAL INSTALLATION MAY VARY.

ISSUED FOR REVIEW
NOT FOR FIELD INSTALLATION
CONTACT ENGINEERING TECH SUPPORT DESK FOR APPROVED DRAWING PRIOR TO INSTALLATION IN THE FIELD

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PROJECT TITLE: SOUTH VALLEY DATA CENTER

DRAWING TITLE: TEMPORARY POWER

DRAWING TYPE: EQUIPMENT LAYOUT - STABILIS REV B

DRAWN BY:	DATE:	CLIENT:
DCH	2/5/26	FLEET
CHECKED BY:	DATE:	PROJECT NO:
-	-	255494
APPROVED BY:	DATE:	PLOT SCALE: / DWG. SCALE: / SIZE:
		NONE / NONE

DRAWING NO: 255494-DWG-L0-02 | SHEET NUMBER: 1 OF 1 | REV: A

Exhibit C

EXHIBIT A
LEGAL DESCRIPTION FOR
APN'S 004-171-25, 004-171-26, 004-171-27, 004-171-28, 004-171-30, 004-181-11 & 004-181-13

All that certain real property situate within a portion of Sections Thirty-three (33) and Thirty-four (34) of Township Nineteen (19) North, Range Twenty-three (23) East and Sections Three (3), Four (4), Five (5) Eight (8) and Nine (9) M.D.M., Storey County, State of Nevada, being all of Parcels 2024-01, 2024-02, 2024-03, 2024-05 and 2024-07 as shown on Map of Division Into Large Parcels File No. 139185, recorded on April 25, 2024 and Parcels 2024-15 and 2024-16 as described in Grant Bargain Sale Deed Document No. 139186, recorded on April 25, 2024, both filed in the Official Records of Storey County, Nevada, being more particularly described as follows:

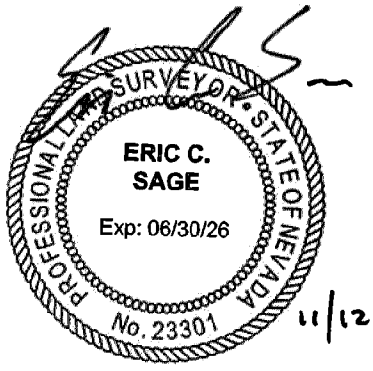
BEGINNING at the most easterly corner of said Parcel 2024-02 being on the southerly right-of-way of USA Parkway, Highway 439 and the County Line for Storey County and Lyon County;
THENCE along said County Line South 28°30'44" West a distance of 11398.50 feet;
THENCE the following Thirteen (13) courses and distances:

1. North 89°18'35" West a distance of 2444.05 feet;
2. North 89°32'14" West a distance of 1320.88 feet;
3. North 00°55'57" East a distance of 2632.66 feet;
4. South 89°20'21" East a distance of 1317.59 feet;
5. North 00°46'07" East a distance of 1318.45 feet;
6. North 89°15'34" West a distance of 1319.24 feet;
7. North 00°41'47" East a distance of 3831.99 feet;
8. South 89°14'21" East a distance of 1426.71 feet;
9. North 00°50'09" East a distance of 2625.12 feet;
10. South 89°20'30" East a distance of 2612.83 feet;
11. North 00°18'32" East a distance of 1311.60 feet;
12. South 89°23'28" East a distance of 2628.61 feet;
13. South 89°28'30" East a distance of 136.84 feet to said southerly right-of-way;

THENCE along said southerly right-of-way South 49°25'20" East a distance of 1659.93 feet;
THENCE 424.19 feet along the arc of a tangent 3750.00 foot radius curve to the left through a central angle of 06°28'52";
THENCE South 66°12'46" East a distance of 320.72 feet;
THENCE South 60°50'43" East a distance of 411.13 feet to the **POINT OF BEGINNING**;
Containing 1530.68 acres of land, more or less.

The basis of bearings for this description is Nevada State Plane Coordinate System, West Zone, North American Datum of 1983/2011. Grid to ground combined factor = 1.0002659997.

Prepared by:
Wood Rodgers, Inc.
1361 Corporate Blvd., Reno, NV 89502



11/12/24

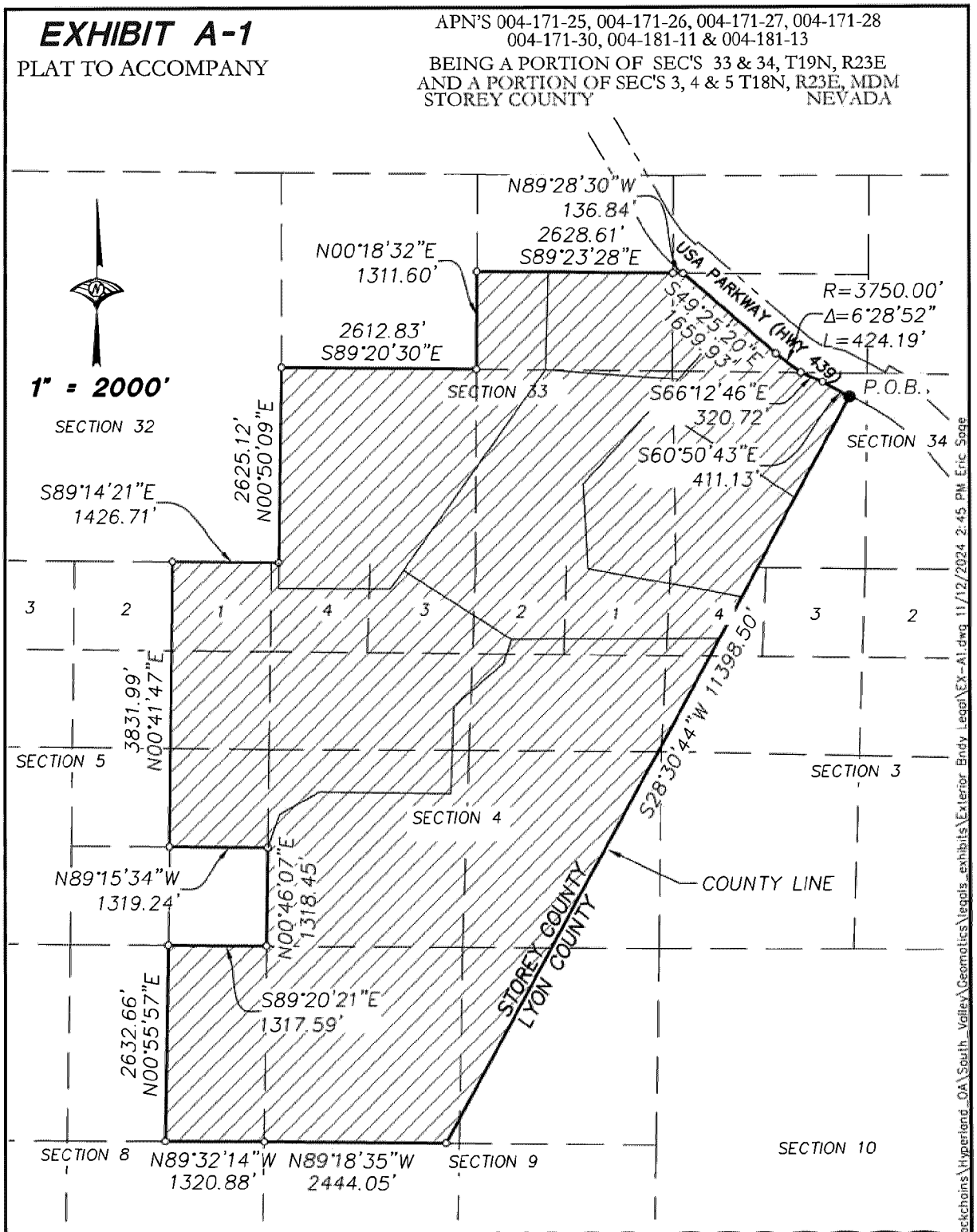
Eric C. Sage, P.L.S., Nevada Certificate No. 23301

EXHIBIT A-1

PLAT TO ACCOMPANY

APN'S 004-171-25, 004-171-26, 004-171-27, 004-171-28
004-171-30, 004-181-11 & 004-181-13

BEING A PORTION OF SEC'S 33 & 34, T19N, R23E
AND A PORTION OF SEC'S 3, 4 & 5 T18N, R23E, MDM
STOREY COUNTY NEVADA



JOB NO. 4128001
SHEET 1 OF 1

WOOD RODGERS
BUILDING RELATIONSHIPS ONE PROJECT AT A TIME
1361 Corporate Blvd
Reno, NV 89502
Tel 775.823.4068
Fax 775.823.4066

J:\Jobs\4128 Blockchains\Hyperlond_OA\South_Valley\Geomatics\legals_exhibits\Exterior Bndy Legal\EX-A1.dwg 11/12/2024 2:45 PM Eric Sage

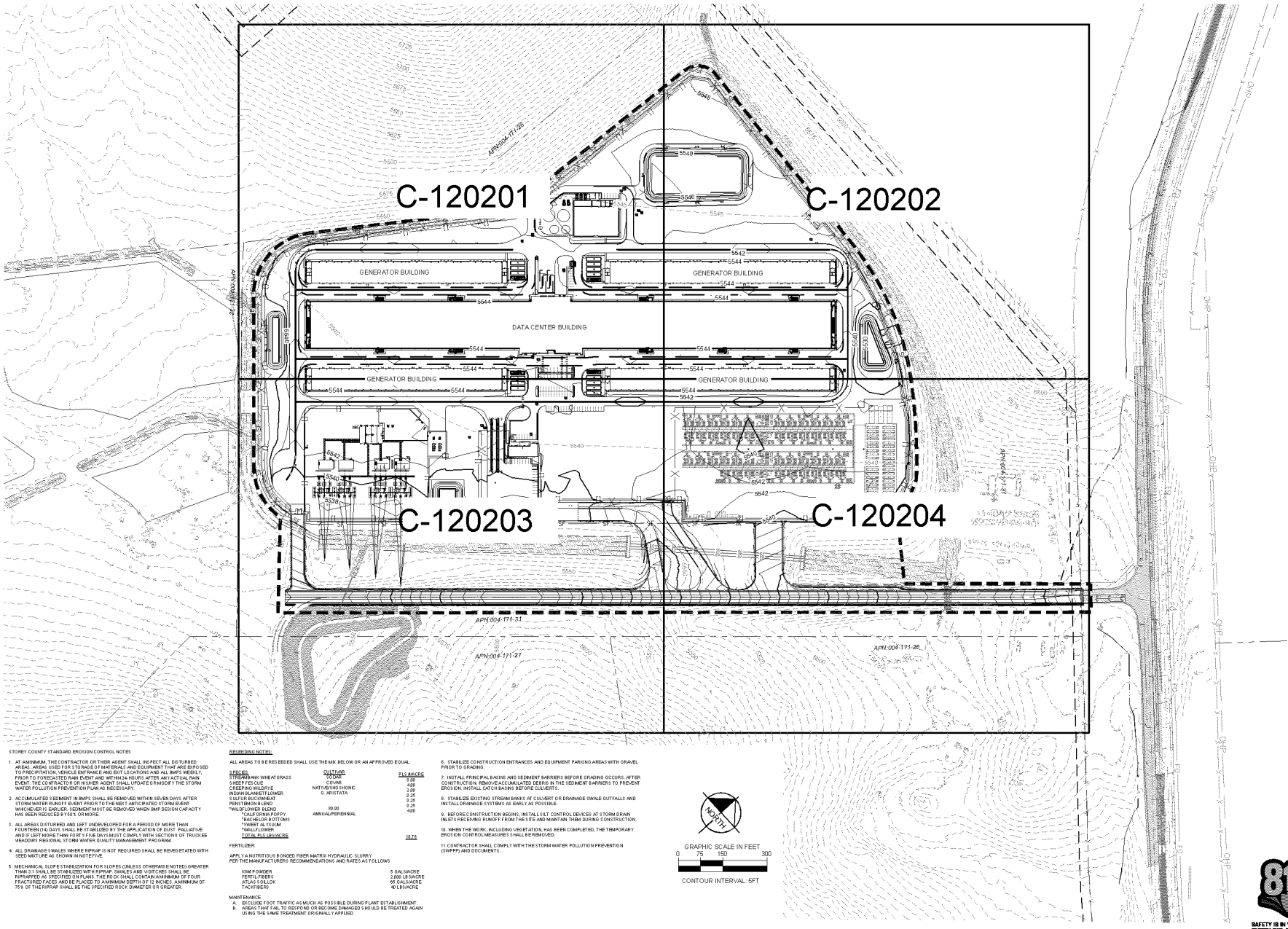
MACKAY SWITCHING STATION TO FORT CHURCHILL – COMSTOCK MEADOWS 345 kV #1 (LINE FOLD) TRANSMISSION LINE PROJECT

PROJECT AREA DESCRIPTION

The project is located entirely within Storey County, Nevada. The project is more specifically located within Sections 1 and 12 of Township 18 North, Range 22 East; and Sections 5, 6, 7, and 8 of Township 18 North, Range 23 East, Mount Diablo Meridian. A list of private land parcels (outside the master planned community) is shown below that encompasses the Project Area.

APN
004-181-03
004-181-05
004-181-08
004-201-13

Exhibit D



STOREY COUNTY STANDARD EROSION CONTROL NOTES

1. AT A MINIMUM, THE CONTRACTOR OR THEIR AGENT SHALL INSPECT ALL DISTURBED AREAS, AREAS USED FOR STORAGE OF MATERIALS AND EQUIPMENT THAT ARE EXPOSED TO PRECIPITATION, VEHICLE ENTRANCE AND EXIT LOCATIONS AND ALL BMPS WEEKLY, PRIOR TO FORECASTED RAIN EVENT AND WITHIN 24 HOURS AFTER ANY ACTUAL RAIN EVENT. THE CONTRACTOR OR HIS/HER AGENT SHALL UPDATE OR MODIFY THE STORM WATER POLLUTION PREVENTION PLAN AS NECESSARY.
2. ACCUMULATED SEDIMENT IN BMPS SHALL BE REMOVED WITHIN SEVEN DAYS AFTER STORM WATER RUNOFF EVENT PRIOR TO THE NEXT ANTICIPATED STORM EVENT, WHICHEVER IS EARLIER. SEDIMENT MUST BE REMOVED WHEN BMP DESIGN CAPACITY HAS BEEN REDUCED BY 50% OR MORE.
3. ALL AREAS DISTURBED AND LEFT UNDEVELOPED FOR A PERIOD OF MORE THAN FOURTEEN (14) DAYS SHALL BE STABILIZED BY THE APPLICATION OF DUST PALLIATIVE AND IF LEFT MORE THAN FORTY-FIVE DAYS MUST COMPLY WITH SECTIONS OF TRUCKEE MEADOWS REGIONAL STORM WATER QUALITY MANAGEMENT PROGRAM.
4. ALL DRAINAGE SWALES WHERE RIPRAP IS NOT REQUIRED SHALL BE REVEGETATED WITH SEED MIXTURE AS SHOWN IN NOTE FIVE.
5. MECHANICAL SLOPE STABILIZATION FOR SLOPES (UNLESS OTHERWISE NOTED) GREATER THAN 2:1 SHALL BE STABILIZED WITH RIPRAP. SWALES AND V-DITCHES SHALL BE RIPRAPPED AS SPECIFIED ON PLANS. THE ROCK SHALL CONTAIN A MINIMUM OF FOUR FRACTURED FACES AND BE PLACED TO A MINIMUM DEPTH OF 12 INCHES. A MINIMUM OF 75% OF THE RIPRAP SHALL BE THE SPECIFIED ROCK DIAMETER OR GREATER.

REVEGETATION NOTES:

ALL AREAS TO BE REVEGETATED SHALL USE THE MIX BELOW OR AN APPROVED EQUAL.

SPECIES	CULTIVAR	PLS LBS/ACRE
STREAMBANK WHEATGRASS	SODAR	8.00
SHEEP FESCUE	COVAR	4.00
CREEPING WILDRYE	NATIVE/OHIO ORIGINIC	2.00
INDIAN BLANKETFLOWER	G. ARISTATA	0.25
SULFUR BUCKWHEAT		0.25
PENSTEMON BLEND		0.25
*WILDFLOWER BLEND	60.00	4.00
*CALIFORNIA POPPY	ANNUAL/PERENNIAL	
*BACHELOR BOTTOMS		
*SWEET ALYSUUM		
*BALLY FLOWER		
TOTAL PLS LBS/ACRE		18.75

FERTILIZER

APPLY A NUTRITIOUS BONDED FIBER MATRIX HYDRAULIC SLURRY PER THE MANUFACTURERS RECOMMENDATIONS AND RATES AS FOLLOWS

KIMP OWDER	5 GAL/ACRE
FERTIL-FIBERS	2,000 LB S/ACRE
ATLAS SOIL LOK	65 GAL/ACRE
TACKIFIBERS	40 LBS/ACRE

MAINTENANCE

A. EXCLUDE FOOT TRAFFIC AS MUCH AS POSSIBLE DURING PLANT ESTABLISHMENT.
B. AREAS THAT FAIL TO RESPOND OR BECOME DAMAGED SHOULD BE TREATED AGAIN USING THE SAME TREATMENT ORIGINALLY APPLIED.

6. STABILIZE CONSTRUCTION ENTRANCES AND EQUIPMENT PARKING AREAS WITH GRAVEL PRIOR TO GRADING.
7. INSTALL PRINCIPAL BASINS AND SEDIMENT BARRIERS BEFORE GRADING OCCURS. AFTER CONSTRUCTION, REMOVE ACCUMULATED DEBRIS IN THE SEDIMENT BARRIERS TO PREVENT EROSION. INSTALL CATCH BASINS BEFORE CULVERTS.
8. STABILIZE EXISTING STREAM BANKS AT CULVERT OR DRAINAGE SWALE OUTFALLS AND INSTALL DRAINAGE SYSTEMS AS EARLY AS POSSIBLE.
9. BEFORE CONSTRUCTION BEGINS, INSTALL SILT CONTROL DEVICES AT STORM DRAIN INLETS RECEIVING RUNOFF FROM THE SITE AND MAINTAIN THEM DURING CONSTRUCTION.
10. WHEN THE WORK, INCLUDING VEGETATION, HAS BEEN COMPLETED, THE TEMPORARY EROSION CONTROL MEASURES SHALL BE REMOVED.
11. CONTRACTOR SHALL COMPLY WITH THE STORM WATER POLLUTION PREVENTION (SWPPP) AND DOCUMENTS.

GRAPHIC SCALE IN FEET
0 75 150 300

CONTOUR INTERVAL: 5FT

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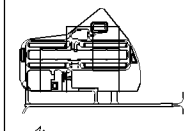
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Key Plan



Stamp/Seal

Rev	Description	Date	Approved
C	EARLY WORKS PERMIT	2026-02-23	JD
D	DESIGN DEVELOPMENT	2026-03-16	JD

DESIGN DEVELOPMENT

Client
FLEET DATA CENTERS
3200 CHERRY CREEK S DRIVE SUITE 500
DENVER, CO 80209

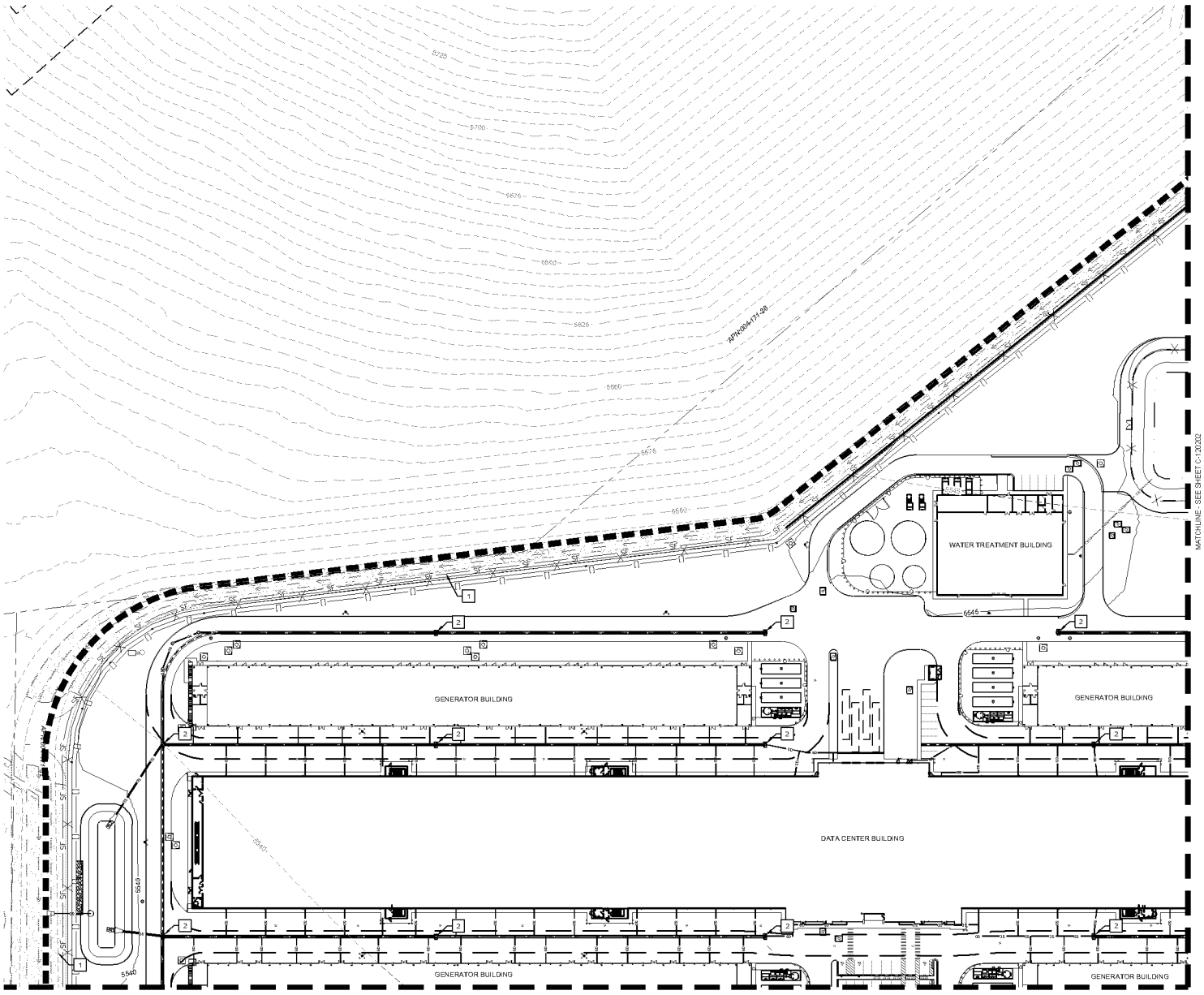
Site
SOUTH VALLEY
RNO20
8990 USA PARKWAY
McCARRAN, NV 89437

Sheet Title
OVERALL EROSION CONTROL

811
SAFETY IS IN YOUR HANDS.
EVERY DIG. EVERY TIME.

Project Number	Drawn	Checked	Approved
RNO20	AK/PB/MA	RW/CW	JD
Sheet Size	Last Issue	Scale	Revision
ANSI D	2026-01-23	As indicated	D

Drawing
RNO20-KHA-00-XX-DR-C-120200



LEGEND

- OUTER PERIMETER FENCE
- INNER PERIMETER FENCE
- PERIMETER SECURITY CAMERAS
- EXISTING DRAINAGE CHANNEL
- NEW DRAINAGE CHANNEL
- PROPERTY LINE
- EASEMENT
- NEW CONCRETE
- EXISTING ASPHALT
- NEW ASPHALT
- FUTURE ASPHALT
- NEW RIP-RAP
- EXISTING RIP-RAP
- EXISTING MAJOR CONTOUR
- EXISTING MINOR CONTOUR
- PROPOSED MAJOR CONTOUR
- PROPOSED MINOR CONTOUR
- PROPOSED SILT FENCE
- EXISTING STORM DRAIN
- NEW STORM DRAIN
- PROPOSED INLET PROTECTION
- CONSTRUCTION ENTRANCE
- BUILDING
- ABOVE GROUND WATER TANK (BY OTHERS)
- COMMUNICATIONS OR ELECTRICAL VAULT
- LIMITS OF DISTURBANCE

EROSION NOTES

1. INSTALL SILT FENCE PER DETAIL 1 , SHEET C-120205.
2. INSTALL INLET PROTECTION PER DETAIL 2, SHEET C-120205.

SILT FENCE NOTE
CONTRACTOR TO INSTALL SILT FENCE AS CLOSE TO EDGE OF MASS GRADED PAD AS FEASIBLE. CONTRACTOR MAY ADJUST SILT FENCE AWAY FROM EDGE OF PAD WHEN SECURITY PERIMETER FENCE IS INSTALLED.

GRAPHIC SCALE IN FEET
0 30 60 120

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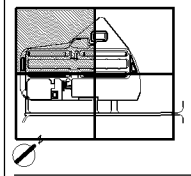
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Key Plan



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DESIGN DEVELOPMENT

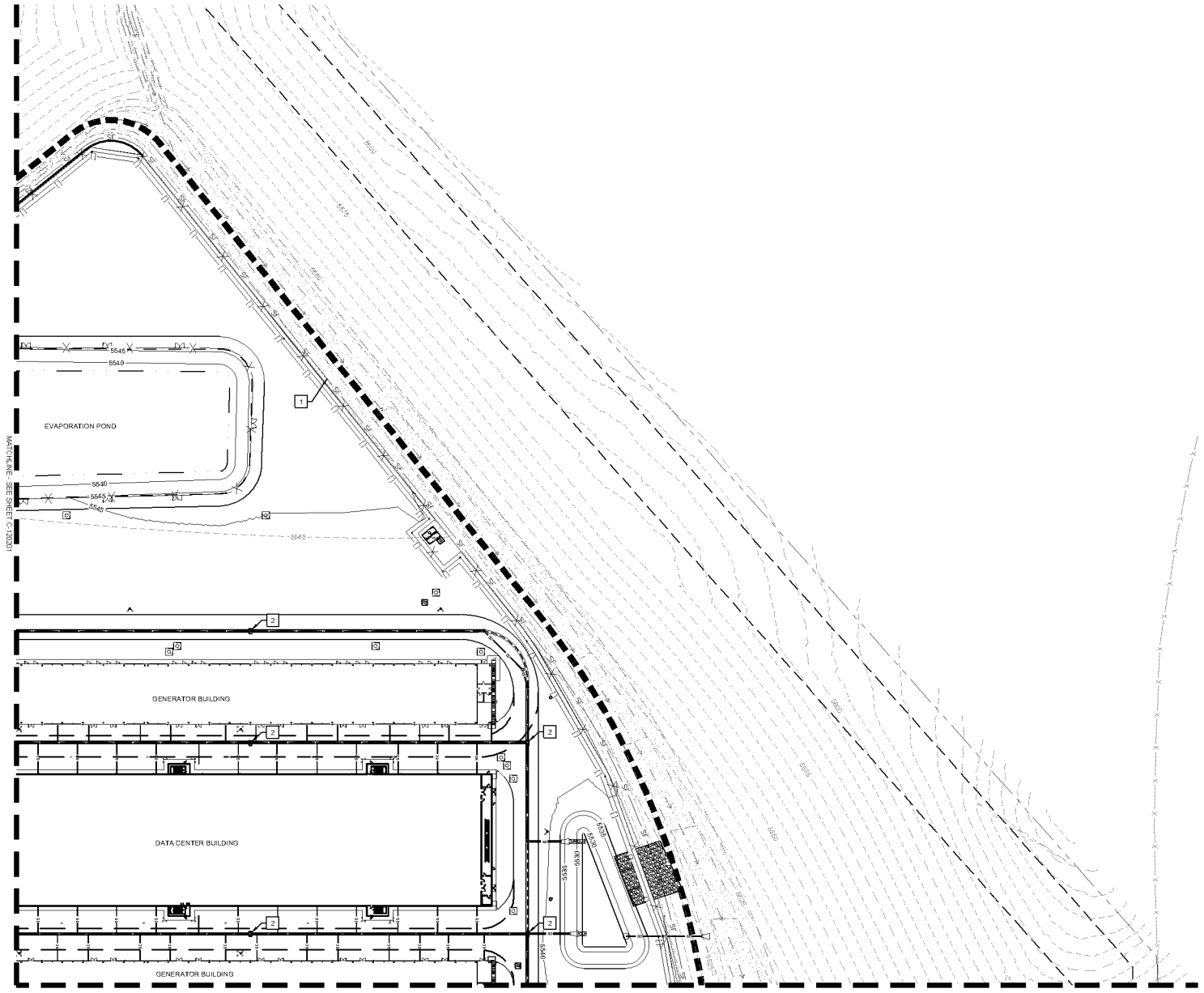
Client
FLEET DATA CENTERS
3200 CHERRY CREEK S DRIVE SUITE 500
DENVER, CO 80209

Title
SOUTH VALLEY
RNO20
8990 USA PARKWAY
McCARRAN, NV 89437

Sheet Title
DETAILED EROSION CONTROL

Project Number	Drawn	Checked	Approved
RNO20	AK/PB/IA	RW/CW	JD
Sheet Size	Last Issue	Scale	Revision
ANSI D	2026-01-23	As indicated	D

Drawing
RNO20-KHA-00-XX-DR-C-120201



LEGEND

- OUTER PERIMETER FENCE
- INNER PERIMETER FENCE
- PERIMETER SECURITY CAMERAS
- EXISTING DRAINAGE CHANNEL
- NEW DRAINAGE CHANNEL
- PROPERTY LINE
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2. INSTALL INLET PROTECTION PER DETAIL 2, SHEET C-120205.

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NORTH

GRAPHIC SCALE IN FEET
0 30 60 120

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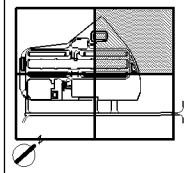
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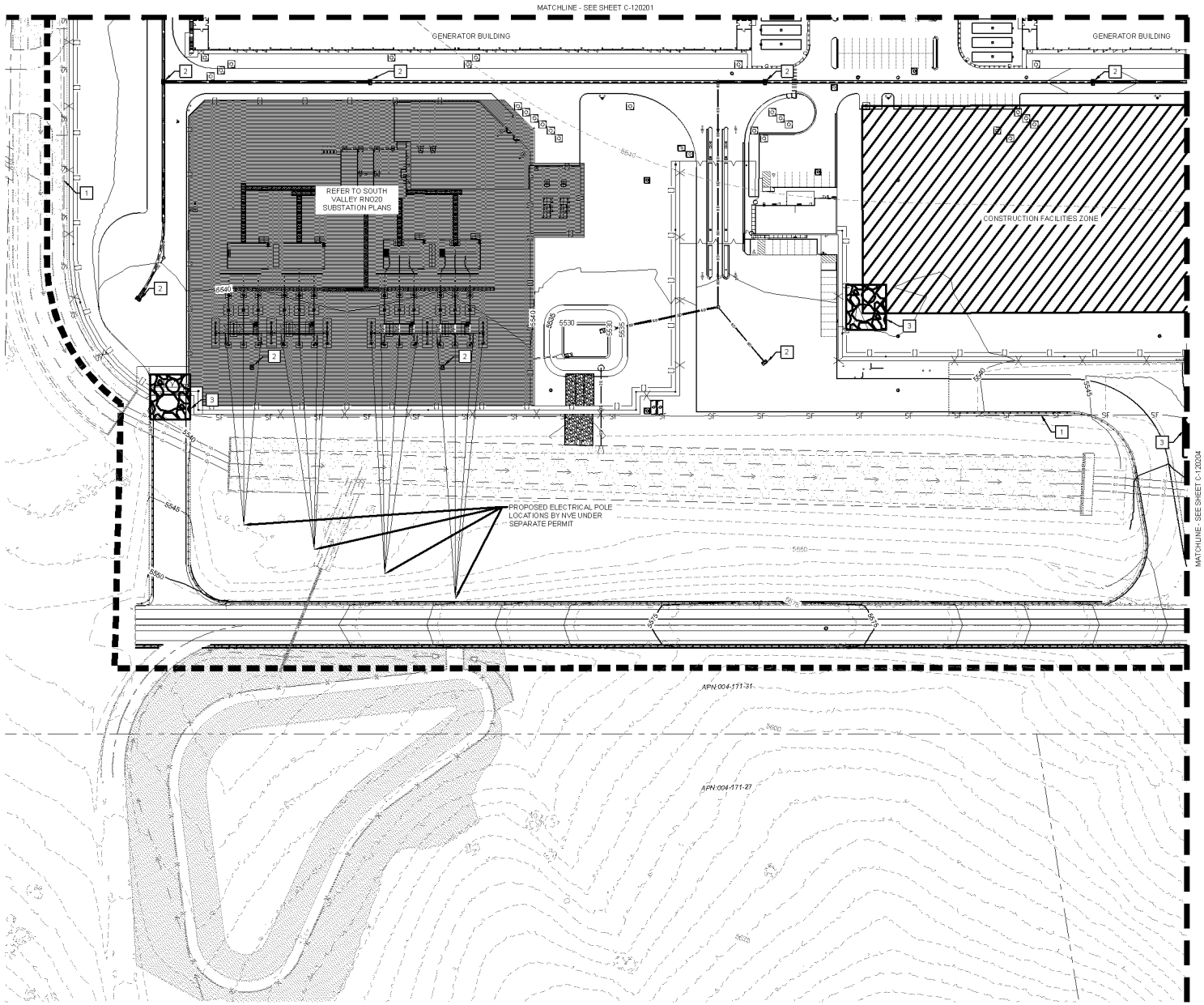
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SOUTH VALLEY
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McCARRAN, NV 89437

Sheet Title
DETAILED EROSION CONTROL

Project Number	Drawn	Checked	Approved
RNO20	AK/PB/IA	RW/CW	JD
Sheet Size	Last Issue	Scale	Revision
ANSI D	2026-01-23	As indicated	D

Drawing
RNO20-KHA-00-XX-DR-C-120202



LEGEND

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EROSION NOTES

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2. INSTALL INLET PROTECTION PER DETAIL 2, SHEET C-120205.
3. INSTALL CONSTRUCTION ENTRANCE PER DETAIL 3, SHEET C-C-120205 .

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GRAPHIC SCALE IN FEET
0 30 60 120

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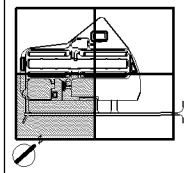
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Key Plan



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DESIGN DEVELOPMENT

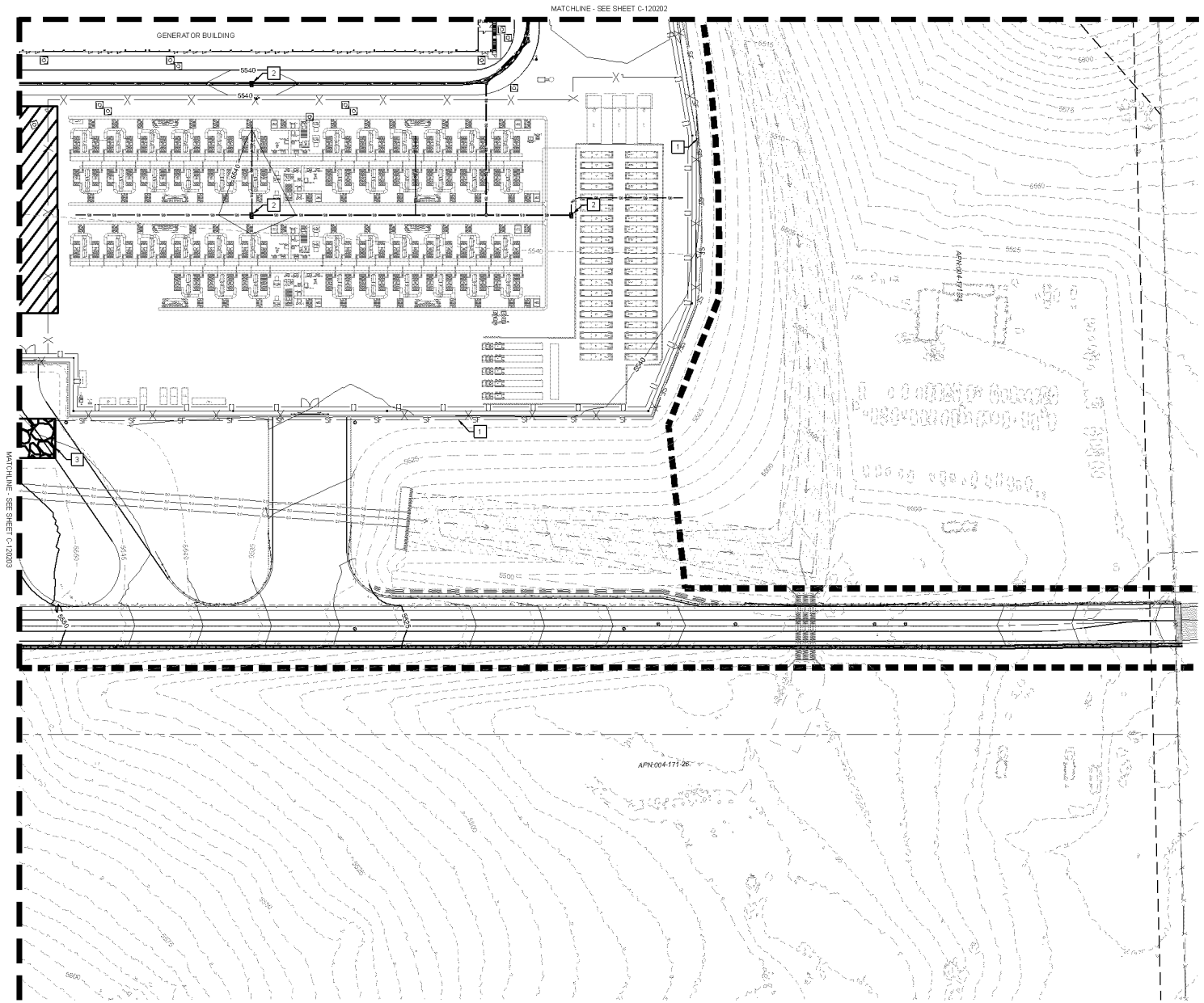
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Project
SOUTH VALLEY
RNO20
8990 USA PARKWAY
McCARRAN, NV 89437

Sheet Title
DETAILED EROSION CONTROL

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ANSI D	2026-01-23	As indicated	D

Drawing
RNO20-KHA-00-XX-DR-C-120203



LEGEND

- OUTER PERIMETER FENCE
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- EXISTING RIP-RAP
- 4640 EXISTING MAJOR CONTOUR
- 4640 EXISTING MINOR CONTOUR
- 4640 PROPOSED MAJOR CONTOUR
- 4640 PROPOSED MINOR CONTOUR
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- SD EXISTING STORM DRAIN
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3. INSTALL CONSTRUCTION ENTRANCE PER DETAIL 3, SHEET C-C-120205 .

SILT FENCE NOTE
CONTRACTOR TO INSTALL SILT FENCE AS CLOSE TO EDGE OF MASS GRADED PAD AS FEASIBLE. CONTRACTOR MAY ADJUST SILT FENCE AWAY FROM EDGE OF PAD WHEN SECURITY PERIMETER FENCE IS INSTALLED.

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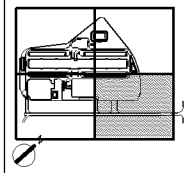
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Key Plan



Stamp/Seal

No.	Description	Date	Approved
C	SURVEY HOLDING PERMIT	2026-02-23	JD
D	DESIGN DEVELOPMENT	2026-03-16	JD

DESIGN DEVELOPMENT

Client
FLEET DATA CENTERS
3200 CHERRY CREEK S DRIVE SUITE 500
DENVER, CO 80209

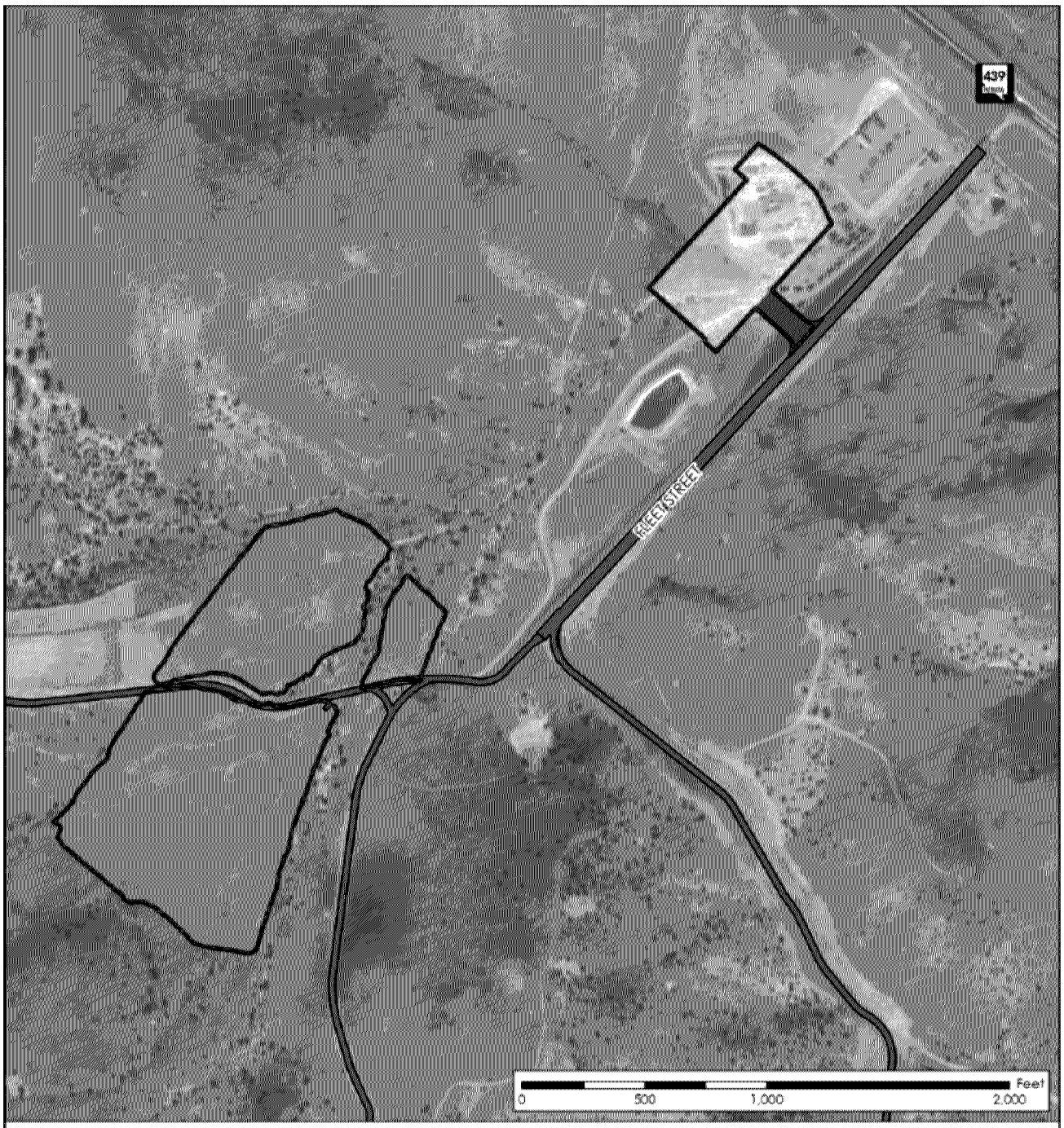
Site
SOUTH VALLEY
RNO20
8990 USA PARKWAY
McCARRAN, NV 89437

Sheet Title
DETAILED EROSION CONTROL

Project Number	Drawn	Checked	Approved
RNO20	AK/PB/IA	RW/CW	JD
Sheet Size	Issue Date	Scale	Revision
ANSI D	2026-01-23	As indicated	D

Drawing
RNO20-KHA-00-XX-DR-C-120204

Exhibit E

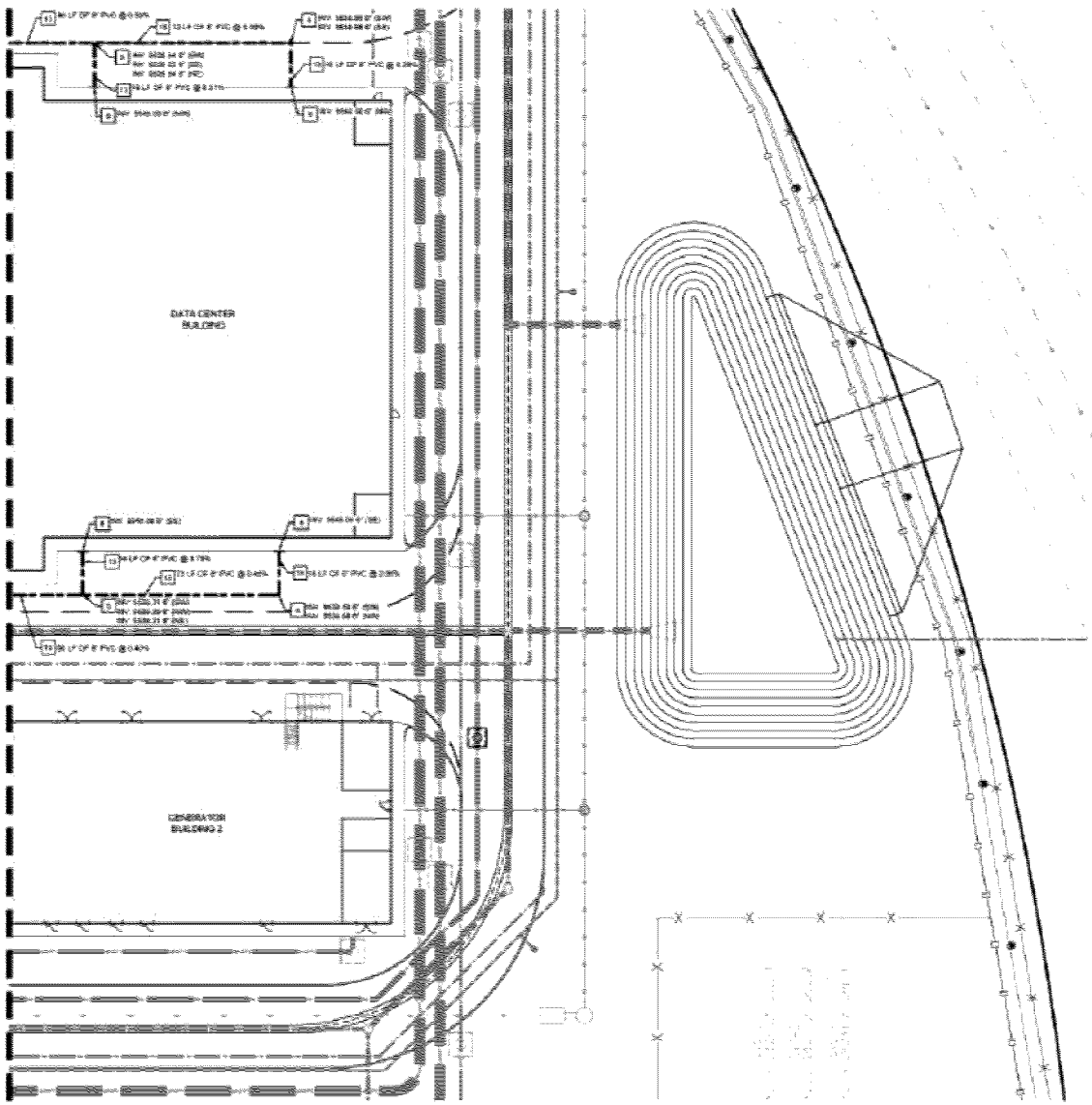


Legend

Scale = 1:8,000
Created: 3/23/2026

Proposed Project Site
Laydown Area
Generation Yard
Existing Access Road
Proposed Access Road

PANORAMA



LEGEND

- PROPERTY LINE
- EASEMENT
- EXISTING OVERHEAD POWER
- FIRE HYDRANT
- BACKFLOW PREVENTOR
- METER
- STORM DRAIN MANHOLE
- SANITARY SEWER MANHOLE
- CLEANOUT
- ABOVE GROUND WATER TANK (BY OTHERS)
- COMMUNICATIONS OR ELECTRICAL VAULT
- GATE VALVE (SIZE TO MATCH LINE)
- NEW DOMESTIC WATER
- NEW FIRE WATER
- NEW INDUSTRIAL WATER
- NEW PROCESS WATER
- NEW SANITARY SEWER
- NEW SANITARY SEWER FORCEMAIN
- EXISTING STORM DRAIN
- NEW STORM DRAIN
- NEW INDUSTRIAL WASTEWATER (GRAVITY)
- INDUSTRIAL WASTEWATER FORCEMAIN
- CONDENSED HOLIDAY PUMP STATION
- NEW FIRE DUCT BANK
- NEW POWER DUCT BANK

NOTES

1. RELEVANT SEWER UTILITIES ARE SHOWN AS BLACK ON RESPECTIVE UTILITY SHEETS. OTHER UTILITIES ARE SHADED BACK FOR CLARITY.
2. REFER TO UTILITY DETAIL SHEETS.
   DRAINAGE DETAILS ON C-10.400 TO C-10.401
   SEWER DETAILS ON C-10.500 TO C-10.501
   WATER DETAILS ON C-10.510 TO C-10.514
   ELECTRICAL AND FIBER DETAILS ON C-10.520 TO C-10.528
3. SEE SYSTEM SEWER PAPER, 5.2 ON C-10.500 TO C-10.501 AND SEWER PROFILES ON C-10.600 TO C-10.606
4. FOR INDUSTRIAL WASTEWATER LAYOUT, BUILDING CONNECTIONS, HOLD 0.5% SLOPE (MIN.) PAST BUILDING FOUNDATION.
5. DIMENSIONS ON PLAN ARE TO CENTER OF PIPE

INDUSTRIAL WASTEWATER NOTES

1. 90° BEND WITH THRUST BLOCK PER DETAIL 2.14.1 ON SHEET C-10.510
2. TEE WITH THRUST BLOCK PER DETAIL 2.14.1 ON SHEET C-10.510
3. CONNECTION TO BUILDING (BY OTHERS). SEE ALL CONNECTIONS REFER TO PLUMBING PLAN BY CHEMTREAT FOR CONTINUATION. FOR LATERALS HOLD 0.50% SLOPE UNTIL PAST BUILDING FOUNDATION. CONTRACTOR TO SUPPLY PIPE AND MATERIALS AS NEEDED
4. INSTALL INDUSTRIAL WASTEWATER PIPE SIZE AS PER LEGEND SIZE AND SLOPE PER PLAN

GRAPHIC SCALE IN FEET
0 20 40

811

Exhibit F



SV RNO Property Owner 1, LLC

Environmental Statement

South Valley Gas Power Generation Facility,
Storey County, NV

Date: April 10, 2026

717 Market Street, Suite 400
San Francisco, CA 94103
650-373-1200
www.panoramaenv.com

SV RNO Property Owner 1, LLC

Environmental Statement

South Valley Gas Power Generation Facility, Storey County, NV

Date: April 10, 2026

Prepared for:
SV RNO Property Owner 1, LLC
3300 East 1st Avenue
Denver, CO 80206

Prepared by:
Panorama Environmental, Inc.
717 Market Street, Suite 400
San Francisco, CA 94103
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PANORAMA
ENVIRONMENTAL, INC.

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Acronyms

Acronym	Definition
AADT	Average annual daily traffic
Aggreko	Aggreko, LLC
APN	Assessor's Parcel Number
Amsl	Above mean sea level
Applicant	SV RNO Property Owner 1
ASCE	American Society of Civil Engineers
BAPC	Bureau of Air Pollution Control
BGEPA	Bald and Golden Eagle Protection Act
bgs	Below ground surface
BMP	Best management practices
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibels
DVT	daily vehicle trips
EPA	Environmental Protection Agency
ES	Environmental Statement
ESA	Endangered Species Act
°F	Degrees Fahrenheit
FEMA	Federal Emergency Management Agency
HA-83	Tracy Segment Hydrographic Area
HA-102	Churchill Valley Hydrographic Area
I-80	Interstate 80
IPaC	Information for Planning and Consultation
LOS	Level of Service
MMTU/hour	Million British Thermal Units per hour
NAAQS	National Ambient Air Quality Standards
NAC	Nevada Administrative Codes
NBMG	Nevada Bureau of Mines and Geology
NDEP	Nevada Department of Environmental Protection
NDNH	Nevada Division of Natural Heritage
NDOT	Nevada Department of Transportation
NDOW	Nevada Department of Wildlife
NDWR	Nevada Division of Water Resources

NHD	National Hydrography Dataset
NO_2	nitrogen dioxide
NOx	nitrogen oxide
NPDES	Nevada Construction Stormwater Permit
NRS	Nevada Revised Statues
NV Energy	Nevada Energy
O_3	ozone
O&M	operations and maintenance
Pb	lead
PM	particulate matter
PSD	Prevention of Significant Deterioration
PUCN	Public Utilities Commission Nevada
RCRA	Resource Conservation and Recovery Act
SAD	Surface Area Disturbance
SCR	Selective Catalytic Reduction
SF_6	sulfur hexafluoride
SHPO	State Historic Preservation Office
SO_2	sulfur dioxide
SPCC	Spill Prevention, Control, and Countermeasures
SWPPP	Stormwater Pollution Prevention Plan
tpy	Tons per year
TRI Center	Tahoe-Reno Industrial Center
TRI-GID	Tahoe-Reno Industrial General Improvement District
TRINA	Traffic Records Information Application
UEPA	Utility Environmental Protection Act
USA Parkway	USA Parkway/Nevada State Route 439
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
US 50	U.S. Route 50
USGS	U.S. Geological Survey
VOC	volatile organic compound
WEAP	Working Environmental Awareness Program
$\mu g/m^3$	Micrograms per cubic meter

1 Introduction

1.1 Project Background

SV RNO Property Owner 1, limited liability corporation (Applicant) is proposing to install a temporary natural gas power generation facility for the purposes of providing power to an onsite data center in accordance with the adopted I-2 Heavy Industrial zone classification (Storey County Code of Ordinances Title 17, Chapter 17.35) on Storey County Assessor's Parcel Numbers (APN) 004-171-25 (Figure 1**Error! Reference source not found.**).

The Project includes the construction of 144-megawatt (MW) capable power generation system using 90 Jenbacher J420 engines. The system would have four Volvo Penta Model TWD1683GE black start engines to assist with system startup. The J420 engines would run on natural gas supplied through a liquified natural gas (LNG) system. The LNG would be transported to the site using LNG containers and loaded into 40 LNG holding tanks. The tanks would be piped to two LNG vaporizers (with dual burners) that each have 26 million British thermal units per hour (MBTU/hour) natural gas burners. The delivery of LNG to the site would occur adjacent to the LNG holding tanks at four delivery stations.

The Project site is approximately 37.4 acres (Figure 2). The power generation facility would be located on approximately 7.6 acres of privately owned land to be built, owned, and operated by the Applicant (Figure 3). The power system is anticipated to be in operation for 2 to 3 years and would be operated and maintained by Aggreko, LLC (Aggreko). The power system would be temporary until Nevada Energy (NV Energy) can deliver the required power to the data center. The power from the system would be non-grid connected and would only provide power to the data center. LNG delivery, storage and vaporizing to natural gas would be handled by Stabilis.

1.2 Project Purpose and Need

The Project would provide the necessary electrical power to service the new South Valley Data Center electric loads. The need for the temporary power system is warranted as data center growth is outpacing the ability for NV Energy to supply power in new areas. This power system is expected to be in use for 2 to 3 years and would cease operation once NV Energy delivers sufficient power to the site.

Figure 1 Project Location

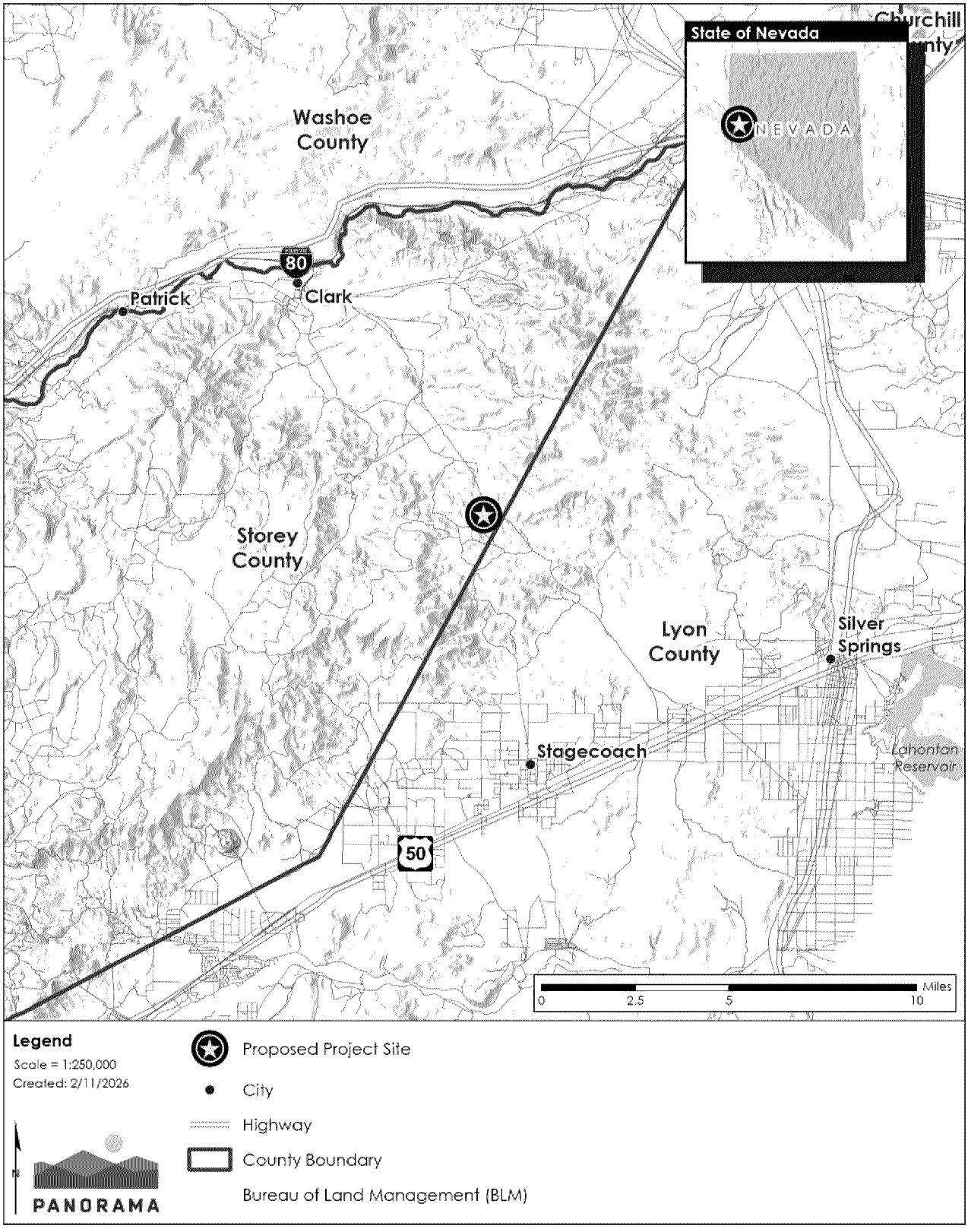


Figure 2 South Valley Gas Generation Facility Project Site

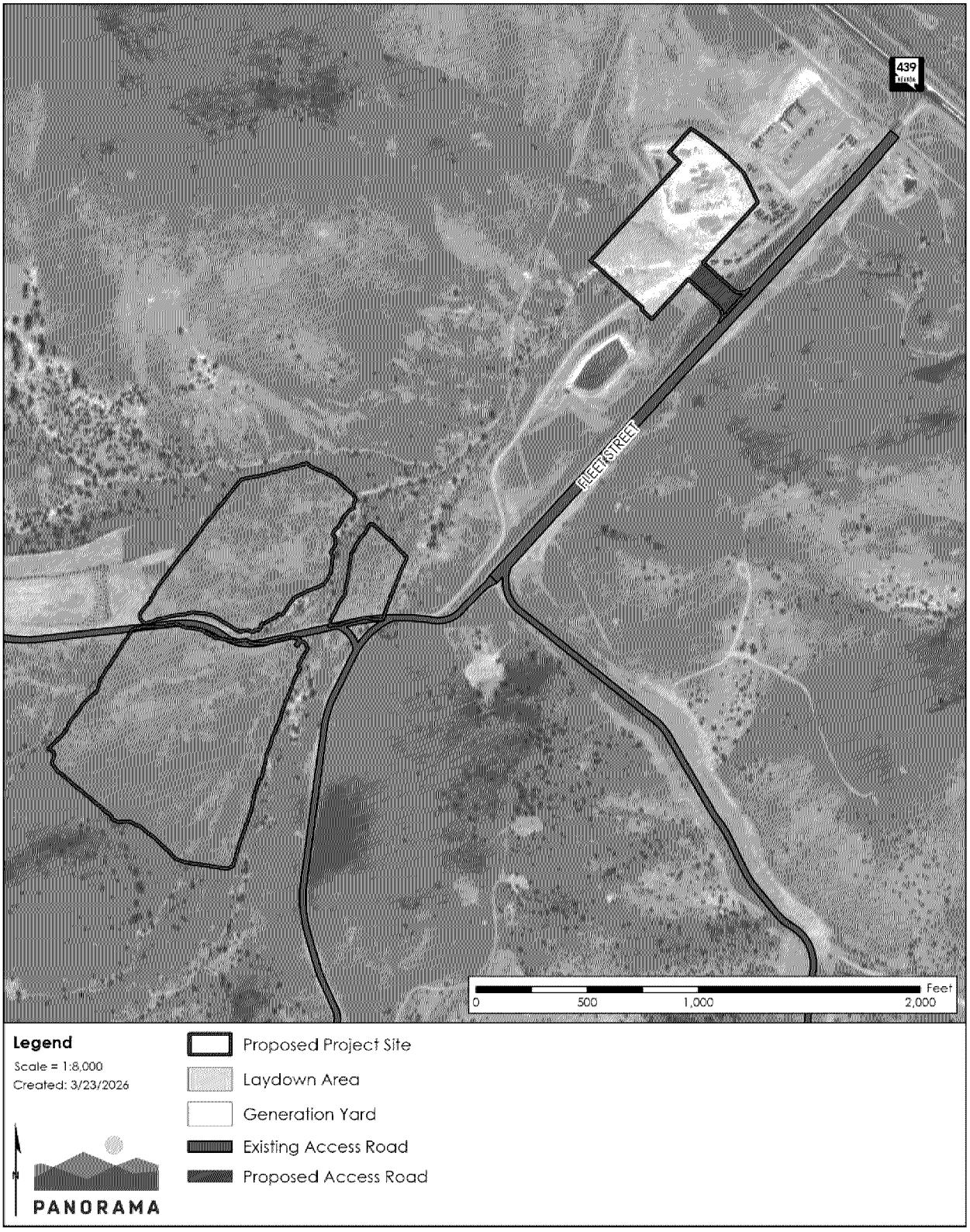
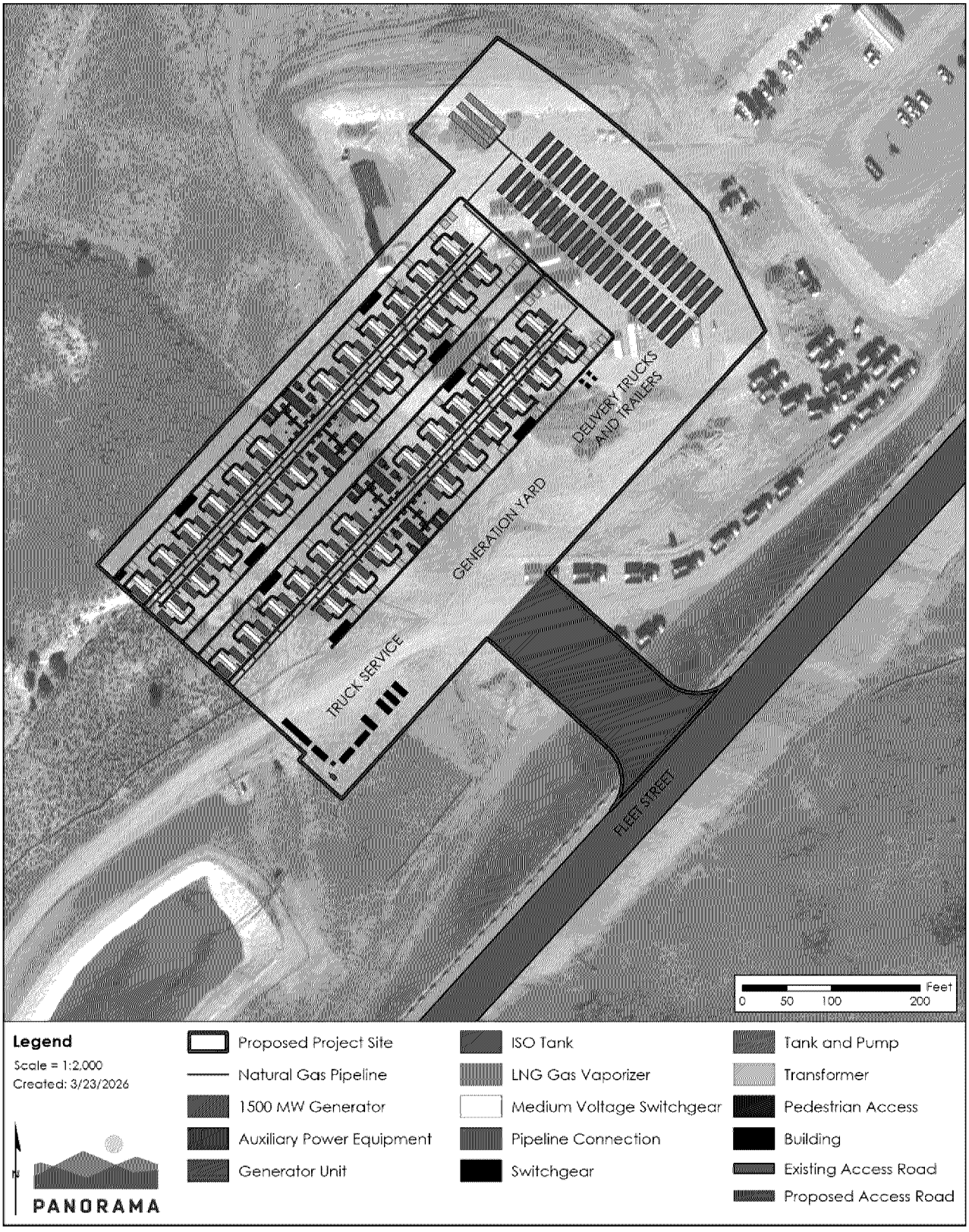


Figure 3 South Valley Gas Generation Facility Components



1.3 Authorizing Actions

The Utility Environmental Protection Act (UEPA) was enacted in 1971 to address environmental issues related to the construction of utility facilities. UEPA permits granted by the Public Utilities Commission of Nevada (PUCN) apply to any new conventional power plant, including temporary power. Since the Project includes a new 144MW capable power plant using natural gas-fired engines, a UEPA permit is needed. One component of the permit process is preparation of an Environmental Statement (ES). This ES evaluates the potential environmental impacts of the Project to be reviewed by the PUCN in compliance with UEPA.

The primary approval required for the Project would be issued by the PUCN. The PUCN would review the ES in accordance with UEPA guidelines. Should the Project be approved, the PUCN would issue an order assessing compliance with UEPA guidelines and would subsequently issue a Permit to Construct after all necessary development approvals have been obtained from federal, State, and local agencies. The PUCN list of potential federal, State, and local permits was reviewed. Table 1 lists permits that may be necessary for the Project for the PUCN to issue a Notice to Construct. These permits and requirements are typical and well understood for projects of this nature. Table 1 also lists the issuing agency for each permit and the anticipated completion date.

Table 1 Regulatory Permits and Approvals

Permit/Approval	Issuing Authority	Expected Date
Surface Area Disturbance (SAD) Permit	Nevada Department of Environmental Protection (NDEP), Bureau of Air Pollution Control (BAPC)	Q2 2026
Nevada Construction Stormwater Permit (NPDES)	NDEP	Q1 2026
Class 1 OPTC Air Permit	NDEP	Q4 2026
Storey County Building Permit	Storey County	Q2 2026

1.4 Environmental Statement Organization

This ES is divided into the following sections:

- **1.0 Introduction**. Provides a brief general description of the Project and its purpose and need. The section also summarizes the Project location, the State and local reviews, regulatory approvals, and permits likely to be required.
- **2.0 Description of Proposed Action and Alternatives**. Describes the Project as well as the alternatives that were considered but eliminated from detailed consideration along with the rationale for their elimination.
- **3.0 Existing Setting, Environmental Consequences, and Mitigation Measures**. Describes the existing environment at and near the Project site. It also details the

potential environmental consequences of the Project and mitigation measures designed to reduce, minimize, or avoid impacts so they are reduced to an acceptable level. In addition, a table summarizing the potential effects, the recommended mitigation measures, along with the timing of those measures and identification of entities responsible for implementation and monitoring, have been included.

- **4.0 List of Preparers and Reviewers**. Lists people who contributed to the preparation and review of this ES.
- **5.0 References**. Lists references used in this ES.

2 Description of Proposed Action and Alternatives

2.1 Project Location and Access

The Project is located in Storey County, Nevada, approximately 27 miles east of the City of Reno in the area south of the Tahoe-Reno Industrial (TRI) Center. The entire Project site is privately owned and on industrial land. The Project is located on Storey County APN 004-171-25. The parcel fronts USA Parkway, a public dedicated roadway. Access would be via USA Parkway and Fleet Street, a private access road.

2.2 Project Disturbance and Acreage

The Project site is approximately 37.4 acres (Figure 2**Error! Reference source not found.**). The entirety of the Project site has been graded as part of the overall site development for a new data center, under existing grading permits from Storey County. Additional underground work may be necessary to construct the power generation station. The J420 engines and the LNG supporting equipment are mobile and can easily be moved into place for site operations. Permanent disturbance would be limited to the gas generation facility and access road. Temporary disturbance would be limited to laydown and staging areas. Project disturbance calculations are shown in Table 2.

Table 2 Proposed Acres of Disturbance

Project Component	Proposed Disturbance (acres)
Permanent Disturbance	
Gas Generation Facility	7.3
Access Road	0.3
Total Permanent Disturbance	**7.6**
Temporary Disturbance	
Laydown and Staging Areas	29.8
Total Temporary Disturbance	**29.8**
Total Surface Disturbance	**37.4**

2.3 Project Facilities

2.3.1 South Valley Power Generation Equipment and Arrangement

Figure 3 shows the site plan for the South Valley temporary power generation facility. The South Valley power generation facility's major equipment includes:

- 90 Jenbacher J420 engines
- 90 Selective Catalytic Reduction (SCR) air pollution controls for nitrogen oxide (NO_x), carbon monoxide (CO), and volatile organic compounds (VOCs)
- Four Volvo Penta Tier 4 TWD1683GE diesel black start engines
- Four 1,240-gallon diesel tanks
- 53 medium voltage transformers
- 40 LNG tanks
- Two (dual-burner) LNG to natural gas vaporizers with 26 MMBTU/hour per burner
- Natural gas piping to J420s from vaporizers
- Protection equipment
- All necessary appurtenances and devices
- Control and relay enclosures
- Utility trenches

2.3.2 Auxiliary Systems for Temporary Power Generation

Water

Water for construction and operations activities at the Project would be provided by the TRI Center water main recently installed along USA Parkway, which fronts the Project site. The water main is managed and operated by the Tahoe-Reno Industrial General Improvement District (TRI-GID).

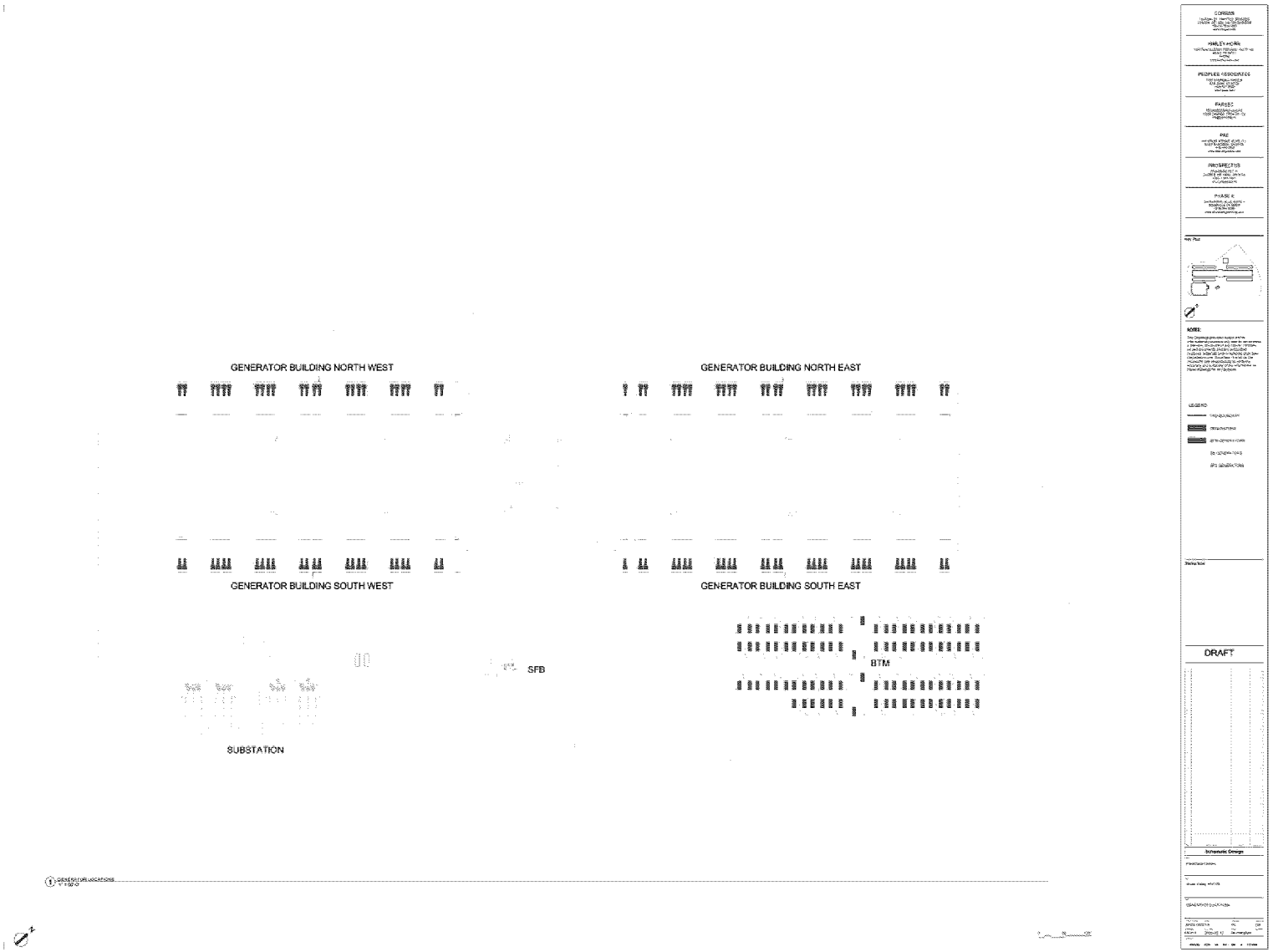
Lighting

The Project's lighting system would provide operations and maintenance (O&M) personnel with illumination for both normal and emergency conditions. Lighting would be designed to provide the minimum illumination needed to achieve safety and security objectives and would be downward facing and shielded to focus illumination on the desired areas only. If lighting at individual structures or equipment is needed for night maintenance, portable lighting would be used. Permanent lighting would be placed at the entrance and within the power generation facility for O&M and for safety purposes.

Site Access Roads, Fencing, and Security

Access to the South Valley power generation facility would be via USA Parkway and local access roads. The power generation site is located inside the South Valley Data Center fence line, as depicted in Figure 4.

Figure 4 Temporary Power Generation Facility Site Plan



The perimeter of the temporary power generation facility would be enclosed by an 8-foot-high expanded metal fence. Access to the power generation system would be controlled (authorized personnel only) using a fence. Select gates would feature provisions to facilitate emergency access for fire department vehicles and truck delivery vehicles. The surrounding data center also has a security fence and would be staffed 24/7.

The LNG delivery center would be located adjacent to the power generation facility. LNG truck deliveries would occur approximately 20 times per day. The site would use a 24-hour delivery window.

2.4 Construction

2.4.1 Site Drainage

The temporary power facility would include a site drainage system consisting of stormwater drainage channels and conveyance piping to a site outfall. The site outfall would remove stormwater from the site and transport it to drainage channels along USA Parkway. Storey County has approved the stormwater drainage systems for the parcel encompassing the power generation facility and data centers (Figure 5).

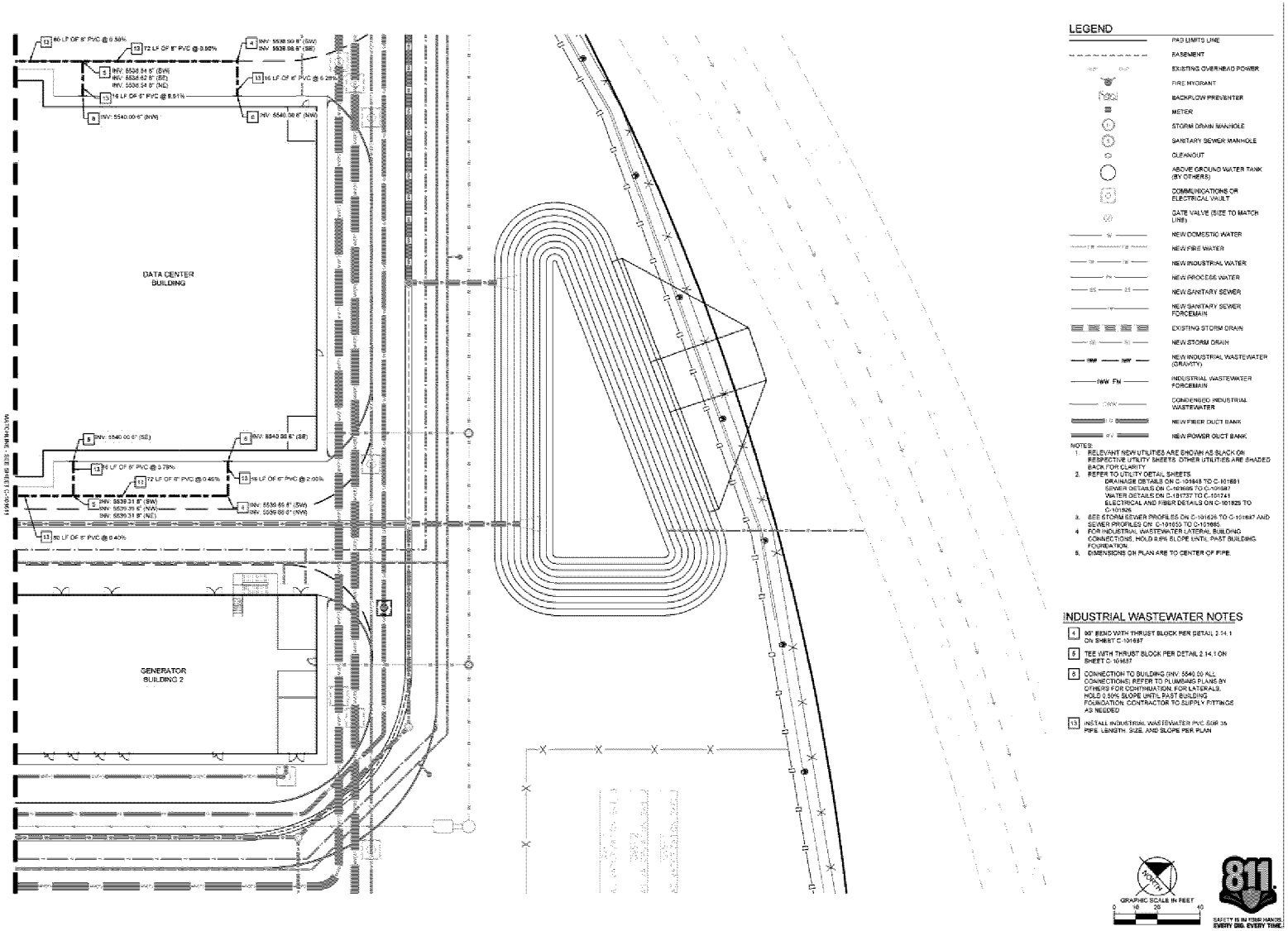
Any additional drainage features would be incorporated into the design of the facility in accordance with the Storey County requirements. The site is located in Federal Emergency Management Agency (FEMA) Zone X which is classified as an "area of minimal flood hazard" and is not within the 100-year flood event zone. Onsite and offsite drainage has been coordinated with Storey County Engineering.

2.4.2 Clearing and Grading

South Valley Temporary Power Facility

The entirety of the South Valley temporary power generation facility has been graded and leveled under the grading permit received from Storey County for the overall data center Project. Surrounding the Project footprint, the plant communities and habitat types are characterized by Sagebrush and Invasive Annual Grassland habitats, but much of the area has already been disturbed by industrial development and master planned improvements. Final grading and removal of stockpiled soils would take place prior to construction of the power generation facility.

Figure 5 Project Site Drainage Plan



2.4.3 Assembly and Construction

South Valley Temporary Power Facility

The power generation facility would be constructed in compliance with applicable electrical safety codes. The power generation and support equipment are designed to be mobile and require little infrastructure preparation. Power transmission to the data center substation would occur using above ground transmission cables. No pads or foundations are expected to be required to install the temporary power equipment

Containment measures for all power generation facility equipment would be provided in accordance with Environmental Protection Agency (EPA) 40 CFR Part 112 and all applicable codes required by the local, State, and federal governing authorities. Transformers would be provided with secondary oil containment equal to 110 percent of the volume of oil present in the transformer in addition to the volume of rainwater for a 25-year, 24-hour rainfall event.

LNG Delivery

The LNG tanks would meet NFPA 59A, ASME, API620, CGA-341 and similar performance requirements for holding high pressure liquids. The tanks are designed to be mobile and can be placed on the site with little to no ground preparation. The LNG vaporizers and delivery systems would be mobile and would require no ground preparation.

Construction would be minimal to install the temporary power generation facility. The equipment required includes, but is not limited to, pick-up trucks, haul trucks, bucket trucks, graders, compactors, cranes, a puller and tensioner, a reel trailer, a splice trailer, and air compressors.

Laydown Areas, Staging Areas, and Work Areas

The laydown and contractor staging area for the South Valley temporary power facility would be on graded land west of the overall data center site. This area would also be where the contractor site trailers/offices as well as fabrication areas, worker break area, sanitation and parking, material staging area, and storage (CONEX) boxes would be located. The laydown and staging area would be approximately 29.8 acres. Temporary power for the main laydown area would be provided by NV Energy and/or mobile generator(s). Potable water for drinking and sanitation would be provided from the water main on USA Parkway. Temporary construction areas, including laydown , staging, and work areas are shown on Figure 2.

Restoration

All construction material and debris would be removed and disposed of at appropriate permitted landfills. All temporary work areas would be recontoured to preconstruction conditions when feasible and stabilized using a seed mix that is representative of the surrounding vegetation community. Permanent areas would be developed into other components of the overall data center complex and thus would not be restored to a vegetative state.

2.4.4 Construction Schedule

Overall Schedule

The Applicant expects onsite construction to begin February 2027. The total construction period for the power generation facility is estimated at 6 to 8 months. If sensitive environmental resources such as nesting birds are encountered in preconstruction surveys or during construction, construction scheduling in those identified portions of the Project site may be modified to prevent impacts to sensitive species or sensitive habitat.

Construction is expected to be conducted for up to 10 hours per day, 6 days per week. Typical construction work schedules are expected to be from 7:00 a.m. to 5:00 p.m., Monday through Saturday, which is within allowed hours of exemption from local noise ordinance restrictions. Storey County's noise exemption for construction activities is between 7:00 a.m. and 7:00 p.m., except Sundays and federal holidays.

Two phases of construction are planned:

1. **Final Grading/Temporary Construction Facilities**. Final grading of the pad for the South Valley power station may be required but is expected to be minimal.
2. **South Valley Temporary Power Facility.** Installing generation engines, breakers and transformers, protection equipment, control and relay enclosure, transmission line to data center substation and security fencing would occur next.

Once all equipment is put in place, system integration, final system checks and operational testing of the generators would begin. Once this step has been completed, regular LNG deliveries would begin to the site and ramp up as the data center is completed.

2.4.5 Construction Materials and Equipment

The following temporary construction facilities would be needed:

- Full-length trailer offices or equivalent
- Parking for construction worker vehicles
- Construction equipment parking
- Fueling area (diesel and gas)
- Chemical toilets
- Holding tanks and/or temporary septic system
- Tool sheds/containers
- Covered assembly area
- Switching Station equipment laydown area
- Diesel power generator(s)

Construction materials, such as concrete, pipe, wire and cable, fuels, reinforcing steel, and small tools and consumables, would be delivered to the site by truck. Initial minimal grading work on the power generation facility area would include the use of excavators, graders, dump trucks, and end loaders, in addition to support pickups, water trucks, and cranes. Use of the following equipment is anticipated:

- Scraper(s)
- Concrete truck(s)
- Motor grader(s)
- Backhoe/loader(s)
- Excavator(s)
- Truck-mounted crane(s)
- Dozer(s)
- Grader-all(s)
- Dump truck(s)
- Flatbed truck(s) for pre-cast foundations
- Pad drum vibrato roller(s)
- Trencher(s)
- Water truck(s)
- Lightweight truck(s)

Following grading and preparation of the site, approximately 113 heavy duty trucks would deliver the J420 engines and associated equipment. This would be a one-time occurrence, and trucks would use the same route to the Project site.

2.4.6 Construction Personnel

The onsite construction workforce would consist of laborers, craftsmen, supervisory personnel, support personnel, and construction management personnel. The workforce needed for the Project would vary during construction. The peak personnel during construction are estimated to be around 20 people, with average manpower of approximately 15 per month.

2.4.7 Construction Waste Management

Overview

During construction, the primary waste generated would be solid non-hazardous waste. However, some non-hazardous liquid waste and hazardous waste (solid and liquid) would also be generated. All the waste generated by the Project would be contained at the Project site. The types of waste potentially generated during construction are described in the following discussion.

Non-Hazardous Solid Waste

Project construction could potentially generate the following non-hazardous waste streams:

- **Paper, Wood, Glass, and Plastics.** This waste is typically generated from packing materials, waste lumber, insulation, and empty non-hazardous chemical containers. This waste would be recycled to the extent practical. Waste that cannot be recycled would be disposed of weekly at an appropriately licensed landfill. Onsite, the waste would be placed in dumpsters.
- **Metal.** Metal waste that includes steel (from welding and cutting operations, packing materials, and empty non-hazardous chemical containers) and aluminum

waste (from packing materials and electrical wiring) would be generated during construction. Metal waste would be recycled where practical and non-recyclable waste would be deposited in an appropriately licensed landfill.

Hazardous Waste

Most of the hazardous waste generated during construction would consist of lubricants, cooling fluids, oily rags, and solvents. Some hazardous solid waste, such as welding materials and dried paint, may also be generated during construction. In the event there are spills at the site, they would be cleaned up, and contaminated soil waste may be generated. Spill cleanup kits would be available on construction vehicles so that spills or leaks of vehicle fluids could be quickly cleaned up for proper disposal. The quantity of hazardous waste is expected to be minimal.

Wastewater

During construction, wastewater would be collected in self-contained systems that would be pumped and disposed of in accordance with local requirements. Wastewater generated during construction would include sanitary waste and equipment wash-down water. These waters may be classified as hazardous or non-hazardous depending on their chemical quality and would be handled and disposed of in accordance with applicable laws.

2.4.8 Erosion and Sediment Controls

Water Erosion Control Measures

Due to the removal or disturbance of soil and vegetation during construction, appropriate water erosion and dust control measures would be required to minimize dust and sediment load to water bodies. The Project would be subject to the NDEP Stormwater Construction Permitting and Stormwater Pollution Prevention Plan (SWPPP) requirements. The site is permitted as required for stormwater and a SWPPP would be developed, if required, before construction begins.

Best management practices (BMPs) and erosion control measures would be implemented to control stormwater runoff. Site-specific BMPs would be implemented by the contractor in compliance with regulations and permit conditions. As appropriate, the following practices for temporary and final erosion control would be implemented:

- All site BMPs such as silt fencing, construction access controls, concrete washout devices, fuel secondary containment structures and other required measures would be put in place before construction begins.
- The weather would be monitored using National Weather Service reports during construction to track conditions and alert crews to the onset of rainfall events.

Existing vegetation would be preserved where feasible. Clearing and grading would be conducted only in areas necessary for Project activities and equipment traffic.

- Temporary fencing or signage would be installed prior to construction along the boundaries of the construction zone to clearly mark this zone, preventing vehicles or personnel from straying onto adjacent offsite habitat.
- Construction activities would be sequenced with the installation of erosion control and sediment control measures. The construction schedule would be planned as practicable to leave existing vegetation undisturbed until grading begins.
- Non-active areas would be stabilized as soon as feasible on those portions of the Project site where construction has temporarily or permanently ceased.
- Covers would be placed over stockpiles prior to forecasted storm events and during windy conditions as necessary to prevent erosion of stockpiles. Sediment controls would be placed (such as fiber rolls, straw bales, silt fencing) around the perimeter of stockpiled materials to control sediment runoff.
- Sufficient erosion control materials would be placed onsite to allow implementation of BMPs. This measure includes implementation requirements for active areas and non-active areas that require deployment before the onset of rain.
- Controls would be repaired and reapplied according to BMPs in areas where erosion is evident.

Wind Erosion Control Measures

The Project would implement the following practices for wind erosion control:

- Vegetation removal and grading would be minimized to the extent practicable.
- Water or dust palliatives would be applied to disturbed soil areas of the Project site to control dust and maintain optimum moisture levels for compaction as required by the NDEP SAD permit. Water would be applied using water trucks. Water application rates would be minimized as necessary to prevent runoff and ponding.
- During windy conditions, including forecast or actual wind conditions of approximately 25 miles per hour or greater, dust control would be applied to haul roads to adequately control wind erosion. Exposed stockpiled material areas would be covered.
- Excavation and grading would be temporarily suspended during periods of high winds when dust cannot be reasonably controlled.
- All trucks hauling soil and other loose materials would be covered or at least 2 feet of freeboard would be maintained.

2.5 Operation and Maintenance of Power Generation Facility

2.5.1 Operation and Maintenance Protocol

O&M activities would be managed and performed by Aggreko with a team of highly qualified technicians. All operations within the South Valley power generation site would follow the appropriate safety protocols. All station personnel would be certified as capable of performing

the operations and of receiving and executing all maintenance activities in accordance with company and manufacturer procedures. The South Valley power generation site would be monitored and controlled onsite. Operators would be onsite to complete maintenance requirements periodically.

Maintenance would be performed as indicated in Table 3.

Table 3 Routine Maintenance Protocol

Component	Frequency	Task
Station transformers	Semi-annually	• Inspect access doors/seals • Inspect electronics enclosure and sensor wiring • Record all gauge readings
	Annually	• Inspect fans for proper operation • Calibrate temperature and pressure sensors • Pull oil sample for oil screening and dissolved gas analysis
Breakers and switchgear	Semi-annually	• Inspect for discoloration of equipment and terminations • Inspect door seals
	Annually	• Check open/close operation
Transmission lines	Annually (and after heavy rains)	• Inspect guy wires and tower angle • Visual inspection of supports/insulators • Visual inspection for discoloration at terminations
Site Integrity	Monthly	• Inspect site and roads for erosion • Inspect site monthly for any ground contamination from petroleum compounds as directed by site Spill Prevention, Countermeasure, and Control (SPCC) Plans • Inspect engines and associated equipment weekly for oil or condensate leakages • Ensure site drainage is working as intended to minimize any standing water around electrical equipment • Ensure any maintenance activities on engines would be performed in a manner that would avoid ground contamination from oils, coolant, or any other chemicals
Engines	As needed	• Monitor and perform any maintenance as required to support 24/7 engine operations • Maintain run logs for all engines and air pollution control equipment collecting information required by the air permits • Maintain SCRs as required to ensure emission reduction performance is maintained as required • SCRs would always operate when the associated engines are operating • Fuel use for all generating operations would be continuously monitored for air permit compliance

2.5.2 Waste Management

Overview

The primary waste generated at the Project site during operations would be non-hazardous solid waste. However, varying quantities of liquid non-hazardous waste and solid and liquid hazardous waste would also be generated. The types of waste and their estimated quantities are discussed in the following subsections.

Non-Hazardous Solid Waste

The Project would produce non-hazardous waste, including rags, broken metal, and machine parts, defective or broken electrical materials, empty containers, and typical refuse generated by site operations, and other miscellaneous solid waste. Large metal parts would be recycled. Other non-hazardous waste would be disposed of in an appropriately licensed landfill. Refuse and trash would be removed from the sites and disposed of in an approved manner.

Hazardous Waste

Limited quantities of hazardous materials would be used onsite for O&M that may require disposal as hazardous waste. These materials would include oils, diesel fuel, lubricants, solvents, galvanized paint, mineral insulating oil, janitorial supplies, office supplies, laboratory supplies, degreasers, herbicides, pesticides, coolant, air conditioning fluids, gasoline, hydraulic fluid, propane, and welding rods. These materials would generally be used in small quantities. Due to the small quantities involved, spills are expected to be cleaned up without resulting in any considerable environmental consequences. Oils or chemicals would be hauled to an approved site for disposal. Spill cleanup kits would be available on equipment so that spills or leaks of onsite tanks, engines or vehicle fluids could be quickly cleaned up for proper disposal. All diesel fuel tanks onsite are double walled with built-in secondary containment.

2.5.3 Health and Safety

The health and safety of employees and contractors is a high priority. All employees and contractors at the site would be required to adhere to the appropriate health and safety plans and emergency response plans adopted by the Applicant for construction, operation, and maintenance of the contemplated utility infrastructure. All construction and operation contractors would be required to operate under a health and safety program that meets industry standards.

2.5.4 Site Security and Lighting

The South Valley power operations would be secured with an 8-foot expanded metal fencing. Lighting would be provided at the site and entrance to the site. A perimeter security system would also be installed around the facility.

2.6 Alternatives Considered but Eliminated from Detailed Consideration

Potential alternatives for the Project were evaluated to determine whether they could substantially achieve the Project goals and objectives to be considered feasible and appropriate for further consideration. The primary purpose of the Project is to provide reliable, onsite power generation to support the South Valley Data Center campus. Because the South Valley power generation facility is in the data center campus, and is centrally located to serve campus electrical demand, alternative locations either within or outside the South Valley property would not meet the operational objectives of the Project. Relocating the facility would increase transmission distances, reduce system efficiency, and potentially require additional infrastructure, resulting in greater environmental disturbance and higher costs. The selected site is the most suitable location for the power generation facility within the South Valley property and minimizes potential environmental impacts. The facility is sited to minimize the length of interconnection facilities to the South Valley Substation and efficiently serve campus electrical demand. No feasible alternative locations or configurations were identified.

3 Existing Setting, Environmental Consequences, and Mitigation Measures

3.1 Introduction

The Project is within the TRI Center, approximately 27 miles southeast of Reno, in Storey County, Nevada. The following resources are analyzed in this ES:

- Geology, Soils, and Paleontology (Section 3.2)
- Water Resources (Section 3.3)
- Air Quality (Section 3.4)
- Biological Resources (Section 3.5)
- Cultural Resources (Section 3.6)
- Land Use (Section 3.7)
- Transportation (Section 3.8)
- Visual Resources (Section 3.9)
- Noise (Section 3.10)
- Waste Management (Section 3.11)
- Socioeconomics (Section 3.12)
- Fire Management (Section 3.13)

3.2 Geology, Soils, and Paleontology

3.2.1 Existing Setting

The Project is in northwestern Nevada within hills of the Virginia Range, a collection of mountain peaks formed by basaltic and andesitic lava flows that occurred in the Tertiary period, approximately 66 million years ago. The Virginia Range lies within the Basin and Range physiographic province and is characterized by high-angle extensional normal faults trending north and northeast. The overall data center site is composed of peaks, outcrops, and valleys. Based on published topographic information, the maximum site elevation at the Project area is approximately 6,000 feet above mean sea level (amsl). The minimum elevation is approximately 5,480 feet amsl.

Soils within the Project site are 100 percent comprised of Dorkiss-Ceejay association. These soil units are generally comprised of gravelly loam, gravelly clay loam, cobbly sandy loam, and clayey subsoils, and bedrock (NRCS 2026). Surface gravels, cobbles, and occasional shallow boulders are common throughout the area. Shallow lithic bedrock is typically encountered at depths of approximately 10 to 20 inches and is often moderately to highly weathered volcanic

rock. Due to the high clay content in the subsurface horizons and shallow soil depth, these soils tend to have low to moderate infiltration rates, resulting in moderate to high runoff potential and increased erosion susceptibility on slopes. Development of the Project site would require final grading for the Project components (NRCS 2026; Westex 2025).

The nearest mapped faults are within the Olinghouse fault zone, a northeast trending left lateral fault system depicted on the Nevada Bureau of Mines and Geology coronary faults map (Nevada Bureau of Mines and Geology [NBMG] Map 167) and associated and Bureau of Land Management default dataset and lies approximately 2.5 miles north of the Project site (dePolo 2008). According to the NBMG, there is approximately a 50 to 60 percent probability of at least one earthquake of magnitude 6.5 or greater occurring within 31 miles within the next 50 years. Therefore, earthquakes and associated impacts should be expected during the life of the Project (Price 2026).

A geotechnical field exploration was completed by Westex Consulting Engineers in March 2025 and consisted of 13 exploratory borings drilled within the vicinity of the Project site, drilled to a maximum depth of 96 feet below the surface. Visual observation of surface rock consist predominately of a soil matrix composed of silty sands and clayey sands, sandy clay and sandy gravel with varying degrees of fine and coarse gravel, with initial bedrock contact at a depth range between surface contact and 40 feet below the existing ground. The native granular soils and rock found onsite are considered suitable for use as properly compacted structural fill, provided any debris, vegetation, and/or oversized material are removed from the appropriate layers (Westex 2025).

The total Project site encompasses approximately 37.4 acres. The entirety of the Project site has previously been graded as part of the overall site development for the data center under existing grading permits issued by Storey County.

The Project vicinity is located on unconsolidated alluvium/colluvium of indeterminate, but most likely Quaternary age. Such strata are usually devoid of fossils and paleontological resources. The probability of finding significant paleontological resources at a given location can be estimated based on previous records recovered from the geologic units present in the area. The fossil record for the TRI Center indicates that the Project site is in an area with variable sensitivity for paleontological resources ranging from low to medium and increases with depth due to the underlying geologic conditions. The potential to encounter intact paleontological resources within previously disturbed areas is considered low. Due to the underlying geology and previous grading that has occurred at the Project site, it is unlikely that paleontological resources would be encountered.

3.2.2 Environmental Consequences

Soils and Soil Hazards

Soils in the Project site or characterized by relatively low infiltration rates due to their clay content, resulting in higher runoff potential and increased susceptibility to erosion. The entirety

of the Project site has been previously disturbed through rough grading conducted under existing grading permits as part of the overall data center site development. These previously graded areas have already experienced soil disturbance and compaction.

Construction activities associated with final grading, installation of the power generation facility, and development of the access road would result in additional soil disturbance and could increase the potential for wind and water erosion, particularly in temporarily exposed areas and in remaining undisturbed portions of the site. BMPs for erosion and sediment control, wind erosion prevention, and dust control would be implemented during construction to minimize soil loss and offsite transport of sediments.

During operation, impacts to soils and soil related hazards would be minimal, as soil disturbance would be limited primarily to infrequent maintenance activities of the access road.

Geologic Hazards

Due to the high likelihood of earthquakes occurring in the vicinity of the Project site, impacts associated with ground-shaking should be expected during operation of the Project. During construction and operation, ground-shaking could damage Project infrastructure and lead to temporary power outages; however, adherence to the American Society of Civil Engineers (ASCE) Code and design guidelines would minimize earthquake and fault hazards by providing engineering criteria needed to ensure the infrastructure can withstand the expected maximum seismic forces.

Paleontology

Potential impacts to paleontological resources from Project construction could include disturbing buried fossils or other paleontological resources during road construction, grading, and installation of utility poles. Although the discovery of paleontological resources is unlikely due to the underlying geology, mitigation measures including training onsite personnel on procedures to be followed in case of an inadvertent discovery would minimize potential impacts. No impacts on paleontological resources are anticipated during operation as no new ground disturbance would occur.

3.2.3 Mitigation Measures and Resource Protection Measures

Soils and Soil Hazards

Wind erosion, water erosion, and dust control measures would be incorporated by construction crews to mitigate potential soil impacts. A complete list of wind erosion BMPs are listed in Section 3.4 Air Quality and water erosion BMPs are listed in Section 3.3 Water Resources. These BMPs, including silt fencing, construction access controls, concrete washout devices, fuel secondary containment structures and other required measures, would be put in place before construction begins. Vegetation removal and grading would be minimized to the extent practicable, and water or dust palliatives would be applied to disturbed soil areas of the Project site to control dust and maintain optimum moisture levels for compaction. Water application rates would be minimized as necessary to prevent runoff and ponding. During windy

conditions, including forecast or actual wind conditions of approximately 25 miles per hour or greater, dust control would be applied to haul roads to adequately control wind erosion. Exposed stockpiled material areas would be covered.

Due to previous grading that has occurred at the Project site, implementation of wind erosion and water erosion BMPs, and implementation of dust control measures, the impact on soils would be minor.

Geologic Hazards

The Project would be constructed to meet the safety standards listed in the ASCE Code and design guidelines, which provide engineering criteria needed to ensure the infrastructure can withstand seismic forces. The Project would also incorporate recommendations from the Supplemental Geotechnical Exploration Report prepared by Westex Consulting Engineers in 2025. Recommendations include mass grading and structural fill specifications and testing to meet the American Society for Testing and Materials standards.

Due to the adherence of ASCE Code, design guidelines, and geotechnical recommendations, the impacts on geology and from geologic hazards would be minimized.

Paleontology

Should fossils or paleontological resources be encountered during construction of the Project, the Applicant's environmental inspectors and/or contractor personnel would be responsible for reporting all discoveries. Workers would attend environmental awareness training prior to construction. The following topics would be addressed in the training: how to recognize a fossil, the procedures to be followed if a discovery is made, understanding of what a fossil represents, and under what circumstances it is acceptable to disturb a fossil (e.g., as part of an emergency recovery procedure).

Due to the discovery of paleontological resources being unlikely given the underlying geology, implementation of mitigation measures including environmental awareness training, and procedures to be followed in case of an inadvertent discovery, the impacts on paleontology would be less than significant.

3.3 Water Resources

3.3.1 Existing Setting

Regulations

The Clean Water Act (CWA) (33 U.S.C. §1251–1376) is the primary federal law regulating water quality across the United States. Its main goal is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." In Nevada, the EPA has delegated implementation authority to NDEP, which oversees compliance and assigns responsibilities to the owners, managers, and operators of public water systems. The Nevada Division of Water Resources (NDWR), under the direction of the State Engineer, manages both surface and

groundwater resources, including the review and administration of water right applications and appropriations. Wetlands receive further protection under Executive Order 11990, *Protection of Wetlands*.

The U.S. Army Corps of Engineers (USACE) is responsible for governing activities involving the discharge of materials and the modification of navigable waters and wetlands, ensuring compliance with the CWA (33 U.S.C. §1344) and the Rivers and Harbors Act (33 U.S.C. §403), as codified in 33 CFR Parts 320–332 and 40 CFR Part 230.

Groundwater

The average annual precipitation in the Project site is approximately 10 inches with higher elevations in the region receiving between 12 to 15 inches of precipitation annually. Annual recharge within Storey County is variable due to several factors including steep topography, low soil permeability, and sparse vegetation. In the summer, sporadic rainstorms contribute approximately 25 percent of the annual precipitation, whereas winter storms are the primary source of upslope recharge (UES 2025). Only limited groundwater data is publicly available within the vicinity of the Project site; however, the depth to groundwater is estimated at approximately 95 to 150 feet below ground surface (bgs) (NDWR 2025).

Surface Water

An initial desktop review of surface water was conducted for the Project site using the USGS National Hydrography Dataset (NHD) and the U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory. The NHD identifies two aquatic features mapped as ephemeral drainages that intersect the Project site, as shown in Figure 6 (U.S. Geological Survey 2026; U.S. Fish & Wildlife Service 2026). The National Wetland Inventory classifies these features as Riverine, intermittent, streambed (R4SBC), indicating that they may convey surface flow during certain times of the year and may be seasonally flooded, but typically lack continuous flow (U.S. Fish & Wildlife Service 2026). During the January 2026 site visit, several ephemeral drainages were observed, and no surface water was present. The ephemeral drainages that intersected the proposed power generation area have been rerouted as part of the overall data center development.

The Project site is located within the FEMA Zone X (unshaded), which is characterized as an area of minimal flood hazard with an annual flood risk of less than 0.2 percent and is outside the 100-year and 500-year floodplains (FEMA 2025).

Figure 6 Waterways in the Project Site



3.3.2 Environmental Consequences

Groundwater/Water Supply

Water supply for construction and operation would be sourced by the TRI Center water main. The water would be distributed using water trucks. Most of the water use would be during construction of the power generation facility and to control dust and maintain optimum moisture levels for compaction as required by the NDEP BAPC SAD permit. The entirety of the proposed power generation facility site has been graded as part of the larger data center campus Project, but water would be used to minimize dust during construction of the power generation facility. Groundwater would not be impacted by construction since water would be supplied from an existing municipal/industrial retailer.

Once constructed, operation of the power generation facility and unpaved access road would not require sustained water use. The minimal new impervious surfaces required for the power generation facility and utility poles would not significantly inhibit the continued infiltration of rainwater into the soil for groundwater recharge. Impacts to groundwater because of the Project are minimal.

Surface Water

Final grading and removal of stockpiled soil would take place prior to construction of the power generation facility. Surface runoff would be collected in the site drainage system consisting of stormwater drainage channels and conveyance piping to a site outfall. The site outfall would remove stormwater from the Project site and transport it to existing drainage channels along USA Parkway. Figure 5 shows the drainage plan for the power generation facility. Until the Project site is stabilized, grading and soil disturbance could temporarily increase erosion and sedimentation into the site drainage system. Soil erosion and sedimentation impacts would be minimized using BMPs and mitigation measures. There is no surface water resources present within the Project site; therefore, no impact on surface waters are expected.

3.3.3 Mitigation and Resource Protection Measures

Water erosion and dust control measures will be incorporated during construction to mitigate potential impacts to surface water. The Applicant will obtain a NPDES permit and prepare a SWPPP for the Project. BMPs will be implemented to minimize erosion, sediment transport, and the potential discharge of pollutants during construction. Site-specific BMPs will be implemented by the contractor in compliance with regulations and permit conditions. As appropriate, the following practices for temporary and final erosion control will be implemented:

- All site BMPs such as silt fencing, construction access controls, concrete washout devices, fuel secondary containment structures and other required measures will be in place during construction.

- The weather will be monitored using National Weather Service reports during construction to track conditions and alert crews to the onset of significant rainfall events.
- Non-active areas will be stabilized and revegetated as soon as feasible on those portions of the Project site where construction has temporarily or permanently ceased.
- Covers will be placed over stockpiles prior to forecasted storm events and during windy conditions as necessary to prevent erosion of stockpiles. Sediment controls will be placed (such as fiber rolls, straw bales, silt fencing) around the perimeter of stockpiled materials to control sediment runoff.
- Controls will be repaired and reapplied according to BMPs in areas where erosion is evident.

Due to the lack of surface water present within the Project site, the application of stormwater BMPs, and implementation of permit conditions requiring mitigation plans, the impact on water resources will minimized.

3.4 Air Quality

3.4.1 Existing Setting

Regulatory

The Clean Air Act (CAA) (42 U.S.C. § 7401 et seq.) as amended, regulates air emissions from stationary and mobile sources. The EPA establishes National Ambient Air Quality Standards (NAAQS) under 40 CFR Part 50 for six criteria air pollutants: sulfur dioxide (SO_2), CO, nitrogen dioxide (NO_2), particulate matter (PM), as $PM_{2.5}$ (particles less than 2.5 microns) and PM_{10} (particles less than 10 microns), ozone (O_3), and lead (Pb). With approval from the EPA, states define regulatory areas, commonly referred to as air basins, within which air quality is monitored for compliance with NAAQS. An air basin is designated as either attainment, meaning it meets the NAAQS, or nonattainment, meaning it does not meet the NAAQS. Areas for which sufficient data is not available to determine compliance with NAAQS are designated as unclassifiable and treated as attainment areas for regulatory purposes. In Nevada, air basins are analogous to hydrographic basins.

Nevada administers the CAA through the Nevada Administrative Codes (NAC) 445B. NDEP BAPC issues air permits and implements federal Prevention of Significant Deterioration (PSD) requirements. The State of Nevada has its own statutory air quality standards, the Nevada State Ambient Air Quality Standards (NSAAQS), which are aligned with federal NAAQS.

The BAPC classifies facilities with the potential to emit more than 100 tons per year (tpy) of any regulated air pollutant as Class I sources, which require a Title V Operating Permit from NDEP under NAC 445B.287. In areas classified as attainment or unclassifiable, the federal PSD program requires any new major source to obtain a PSD permit to prevent deterioration of air

quality. A PSD "major source" is defined as any facility having potential emissions greater than 250 tpy (or 100 tpy for listed source categories).

Under CAA Section 107(d) and NAC 445B, once a minor source baseline date has been triggered within a hydrographic area, all new air permit applications in that area, including those for PSD minor sources, must include a PSD increment analysis. A PSD increment analysis uses EPA-approved dispersion modeling to estimate a Project's increase in ambient concentrations of baseline pollutants (i.e., NO_2 and PM_{10}) within the baseline trigger area and any potentially affected neighboring baseline trigger areas. The modeled concentration increase is added to the existing increment consumption (i.e., the amount of allowable deterioration already used by previously permitted sources) and compared to the applicable increment limits established in 40 CFR § 52.21(c). These limits represent the maximum allowable increase above baseline concentrations established to ensure that air quality in attainment or unclassifiable areas does not significantly deteriorate. This analysis confirms whether the Project's emissions, when combined with existing increment consumption, remain within these allowable limits.

Existing Air Quality

The Project site is within the TRI Center area and lies along USA Parkway/Nevada State Route 439 (USA Parkway) in Storey County. The Project site is on flat to rolling terrain at approximately 5,500 feet above mean sea level (amsl), with elevations ranging from approximately 5,460 feet amsl to 5,670 feet amsl. The semi-arid climate of Storey County is characterized by hot, dry summers and cool, dry winters with minimal precipitation that average 5.9 inches annually according to the nearest weather recording station located in Fernley, Nevada. Average temperatures for the area range from 93 degrees Fahrenheit (°F) in July to 19 °F in January and December (Western Regional Climate Center 2025).

The Project site is designated attainment/unclassifiable for all criteria pollutants and is located within a PSD Class II, which is subject to standard PSD increment limits and allows for moderate amount of air quality deterioration (BlueScape 2026; EPA 2025). The Project site is within the Churchill Valley Hydrographic Basin (HA-102), which is part of the Carson River Region. However, the site is situated near the Tracy Segment Hydrographic Area (HA-83). HA-83 is a PSD minor source baseline trigger area for NO_x and PM_{10} as of March 22, 1994, following submittal of a complete PSD permit application for Tracy Generating Station by Sierra Pacific Power Company. HA-102 is also a baseline trigger for NO_x (BlueScape 2026). Given the Project's location within HA-102 and it proximity to HA-83, both hydrographic basins were evaluated to assess potential PSD increment consumption for applicable pollutants.

3.4.2 Environmental Consequences

Construction Emissions

Construction-related emissions would be temporary and include fugitive dust and diesel exhaust from construction equipment. BMPs, including watering exposed surfaces, limiting vehicle speeds, and maintaining equipment, would be implemented to minimize emissions.

Because construction emissions are temporary and controlled through BMP implementation, impacts would be short-term and minor.

Operation Emissions

The Project consists of the following stationary combustion sources:

- Up to 90 Jenbacher J420 natural gas-fired reciprocating engines (P1 Power Plant), each rated at approximately 1.2 MW due to site-specific derating. Engines would operate primarily in prime power mode.
- Two LNG-fired vaporizers used to convert liquefied natural gas to pipeline-quality natural gas.
- Four black start GEN sets (dual engine units).

Each Jenbacher engine would be equipped with a SCR system designed to substantially reduce emissions of NO_x, CO, and VOC. The LNG vaporizers would operate at their maximum design firing rate under worst-case modeling assumptions.

The diesel-fired black start generator sets are designed solely to provide an initial startup power to the J420 turbines. These units would operate only on a limited basis for testing and startup purposes and are restricted to a maximum of 100 hours per year. For mass emissions and dispersion modeling, the black start engines units were conservatively evaluated at maximum load to assess short-term impacts, and annual impacts were adjusted to reflect their limited operational hours. All diesel-powered engines would meet applicable EPA Tier 4 emission standards and operate on ultra-low sulfur diesel fuel. Table 4 shows the anticipated emissions from the Project during operation.

Table 4 Anticipated Operations Emissions from the Project

Pollutant	Jenbacher J420 engine emissions (tons/year)	Black start generator set emissions (tons/year)	LNG Vaporizer emissions (tons/year)	Project total emissions (tons/year)
NO_x	88.47	0.24	16.85	105.57
CO	91.61	0.04	16.85	108.50
$PM_{10/2.5}$	17.62	0.01	3.42	21.04
VOC	35.23	0.01	2.46	37.70
SO_2	26.43	0.01	0.27	26.70
CO_2	223,639.82	621.10	41.00	224,301.91

Source: (BlueScape 2026)

As the Project Potential to Emit (PTE) is not greater than 250 tpy for any criteria air pollutant and is not a listed categorial source under the federal PSD program, it is therefore classified as a PSD minor source. Because the Project PTE for at least one criteria air pollutant is greater than 100 tpy, the Project requires a Class I air permit from the BAPC. Also, because the Project is

located in and adjacent to minor source baseline trigger areas, air dispersion modeling and increment tracking analysis are required as part of the Class I air permit application.

Air dispersion modeling was conducted using EPA-approved AERMOD (version 24142) in accordance with 40 CFR part 51, Appendix W, NDEP General Air Dispersion Modeling Guidelines, and NDEP Class I Operating Permit Guidance. Modeling evaluated $PM_{2.5}$, PM_{10}, NO_2, SO_2, CO, and O_3. The dispersion and PSD increment analyses evaluate emissions from the proposed gas-fired power generation equipment together with emissions from combustion sources associated with the adjacent data center facility, comprising backup generators, fire pump engines, and backup engines. Because these sources would be co-located and constructed as part of the overall South Valley Technology Center Project development, the dispersion modeling evaluates their combined emissions so as to account for the cumulative contribution of both the gas-fired power generation equipment and the associated data center combustion sources to ambient pollutant concentrations. The results of the dispersion modeling are presented in Table 5 and show pollutant emissions from the Project would not cause or contribute to exceed of the NAAQS.

Table 5 Estimated Annual Operational Emissions

Pollutant	Averaging Period	Project Modeled concentration (micrograms per cubic meter [µg/m³])	Total Concentration (including background) (µg/m³)	NAAQS (µg/m³)	Exceeds?
$PM_{2.5}$	24-hour	13.6	21.6	35	No
	Annual	1.94	4.24	12	No
PM_{10}	24-hour	20.0	30.2	150	No
	Annual	1.94	1.94	50	No
NO_2	1-hour	138	138	188	No
	Annual	12.1	12.1	100	No
SO_2	1-hour	69.6	69.6	196	No
CO	8-hour	256	256	10,500	No

Source: (BlueScape 2026)

Ozone (O_3) was evaluated separately from the AERMOD dispersion analysis because ozone is a secondary pollutant formed through atmospheric photochemical reactions of nitrogen oxides (NO_x) and volatile organic compounds (VOC). Consistent with NDEP guidance, ozone impacts were assessed using the EPA's VOC/NO_x Point Source Screening Tables (Scheffe Method). The maximum predicted ozone contribution from Project emissions is 0.009 parts per million, which is below the applicable 1-hour ozone standard of 0.070 parts per million. Therefore, the Project complies with applicable ozone standards (BlueScape 2026).

An increment analysis was run to calculate the increase in ambient concentrations of the pollutants of concern (i.e., NO_2 and PM_{10}) above the PSD minor source baseline concentration (i.e., the increment) that would result from the operation of the Project at each receptor in the established grid. Receptor grids were provided by NDEP and consisted of receptors spaced 500 meters apart within both HA-083 (the location of the Project) and HA-102, which is proximate to and generally southeast of the Project site. The analysis utilized EPA-approved AERMOD dispersion modeling to quantify the Project's maximum offsite incremental concentration increases and compare them to the applicable Class II PSD increment thresholds. The applicable Class II PSD increment thresholds are:

- Annual NO_2: 25 $\mu g/m^3$
- Annual PM_{10}: 17 $\mu g/m^3$
- 24-hour PM_{10}: 30 $\mu g/m^3$

Modeled concentrations were added to existing increment consumption values for each receptor to determine compliance with the increment limits established under 40 CFR § 52.21(c). Results are summarized in Table 6.

Table 6 Maximum Modeled PSD Increment Impacts

Pollutant	Averaging Period	Maximum Modeled Increment ($\mu g/m^3$)	PSD Class II Increment Threshold ($\mu g/m3$)	Exceeds Threshold?	Notes
NO_2	Annual	0.054	25	No	Well below increment limit
PM_{10}	Annual	0.012	17	No	Well below increment limit
PM_{10}	24-hour	0.085	30	No*	Existing baseline consumption exceeds limit at certain receptors; Project contribution does not exceed SIL

[a] The modeling report concludes that any exceedances of the 24-hour PM_{10} increment limit are attributable to pre-existing baseline increment consumption rather than the Project's emissions. The Project's modeled contribution does not exceed applicable Significant Impact Levels (SILs) and is considered negligible (BlueScape 2026).

Source: (BlueScape 2026)

The increment tracking analysis demonstrates that the Project's incremental emissions increases, when added to existing increment consumption within HA-83 and HA-102, remain below the applicable Class II PSD increment thresholds for annual NO_2 and annual PM_{10}. Where the analysis shows an exceedance of the increment limit for PM_{10}, the existing 24-hour PM_{10} increment consumption is already exceeded at those receptors. However, the Project's maximum modeled increment of 0.085 $\mu g/m^3$ for PM_{10} falls below the PSD SIL of 5 $\mu g/m^3$(BlueScape 2026). The Project therefore would not cause or significantly contribute to exceedance of the increment limit or deterioration of air quality.

Construction-related air quality impacts would be temporary and localized, primarily consisting of fugitive dust and diesel exhaust emissions from construction equipment and onsite activities. Implementation of required mitigation measures, including compliance with NDEP's SAD permit requirements, application of water or dust suppressants to disturbed areas, suspension of grading during high wind conditions, covering of haul trucks, and use of Tier 4–compliant diesel equipment operating on ultra-low sulfur diesel, would substantially reduce particulate matter and exhaust emissions during construction. These measures are designed to minimize wind erosion, control dust generation at the source, and reduce combustion-related emissions to the maximum extent practicable. With implementation of these controls, construction-related air quality impacts would be short-term and less than significant.

During operation, the Project would incorporate permanent emission control technologies, including SCR systems on natural gas engines, use of Tier 4–certified diesel engines, limited annual operating hours for emergency equipment, and routine maintenance and monitoring to ensure continued control efficiency. Dispersion modeling conducted in accordance with EPA and NDEP requirements demonstrates compliance with all applicable NAAQS. The PSD increment tracking analysis confirms that modeled increases in annual NO_2 and annual PM_{10} concentrations would not cause of significantly contribute to exceedance of the applicable Class II increment limits. Although existing 24-hour PM_{10} increment consumption exceeds the allowable threshold at certain receptors, the Project's modeled contribution does not exceed applicable SIL and therefore does not significantly contribute to those exceedances. Ozone impacts were evaluated using EPA's Scheffe screening method and were determined to be well below applicable standards. With incorporation of the identified mitigation measures, required permits, and enforceable operational controls, the Project would not cause or contribute to a violation of ambient air quality standards or PSD increment limits, and operational air quality impacts would be less than significant.

3.4.3 Mitigation Measures

Wind erosion and dust control measures will be incorporated by construction crews to minimize potential impacts to air quality. The Project will comply with the requirements of the NDEP BAPC SAD permit, including implementation of site-specific BMPs fugitive dust emissions. As appropriate, the following practices for temporary and final erosion control will be implemented:

- Vegetation removal and grading will be minimized to the extent practicable.
- Water or dust palliatives will be applied to disturbed soil areas of the Project site to control dust and maintain optimum moisture levels for compaction as required by the NDEP BAPC SAD permit. Water will be applied using water trucks. Water application rates will be minimized as necessary to prevent runoff and ponding.
- During windy conditions, including forecast or actual wind conditions of approximately 25 miles per hour or greater, dust control will be applied to haul roads to adequately control wind erosion. Exposed stockpiled material areas will be covered.

- Excavation and grading will be temporarily suspended during periods of high winds when dust cannot be reasonably controlled.
- All trucks hauling soil and other loose materials will be covered or at least 2 feet of freeboard will be maintained.
- SCR systems would be installed on all Jenbacher engines and are subject to manufacturer emissions guarantees ensuring compliance with design emission limits over a minimum two-year operational period.
- Diesel-powered equipment would be limited to Tier 4–compliant engines, which meet the most stringent federal emissions standards for non-road diesel engines and substantially reduce emissions of nitrogen oxides and particulate matter.
- All diesel-powered equipment would operate on ultra-low sulfur diesel fuel, which minimizes sulfur dioxide emissions and supports optimal performance of diesel emission control systems.
- Routine maintenance and operational monitoring would be implemented for all combustion sources to ensure continued performance of emission control systems and compliance with applicable air quality requirements throughout the operational life of the Project.

Due to the nominal amount of emissions anticipated as a result of Project construction and maintenance activities, wind erosion BMPs, dust control measures, implementation of control technologies, and required permits, the impact on air quality will be minimized.

3.5 Biological Resources

3.5.1 Overview

This biological resources section describes the vegetation communities, plants, and wildlife species present, or potentially present, within the Project site and the potential impacts on these resources resulting from the Project's construction and operation. Special status plant and wildlife species with potential to occur in the Project site are evaluated in this section. For the purposes of this ES, special status species are those that have designated conservation status(es) under the Endangered Species Act (ESA) (as administered by USFWS) and/or NAC.501 and NAC.503 (administered by the Nevada Department of Wildlife [NDOW]) or are designated by NDOW as priority species. The Nevada Division of Natural Heritage (NDNH) identifies species whose populations are in decline and classifies them as vulnerable, imperiled, or endangered and makes recommendations to NDOW regarding their need to be placed on the list of Nevada protected species. These NDNH species are evaluated in this ES as special status species but permits for take of these species are not required. Other groups of protected species include migratory birds and eagles protected by the Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act (BGEPA). This ES also addresses potential for impacts to sensitive habitats. Sensitive habitats are either (1) recognized by the NDNH or USFWS as being locally depleted, (2) considered regionally rare by experts, (3) known to support special status species, or (4) known to serve as important wildlife corridors.

A biological resources assessment was previously prepared by UES for the Project site and adjacent areas to the south and west of the Project site in October 2024 (UES 2024a). The assessment included data queries from the USFWS, NDOW, NDNH, and other publicly available data sources for understanding habitat, waters, and species in the area. As part of the assessment, a UES biologist conducted a site visit on July 16, 2024, to verify vegetation communities and evaluate the potential presence of special status plants using the intuitive controlled survey method. This method involves identifying potentially suitable habitats for special status plants in the field and checking those habitats for the presence of special status plants. This survey was performed during the blooming period for special status plants, when diagnostic characteristics are most visible, thereby maximizing the likelihood of detection of such species (UES 2024a). The biologist also visited abandoned mine land features identified in the U.S. Geological Survey (USGS) Mineral Resources Data System and the NBMG to assess their potential suitability for bats roosting or hibernation. Wildlife observed during the site visit wase documented (UES 2024a).

A site visit was performed by a Panorama biologist on January 22, 2026. The purpose of the visit was to verify existing biological resource information and to document current site conditions, including vegetation communities, habitat characteristics, and potential wildlife use within the Project site.

The following sources of information were used to evaluate biological resources within the Project site:

- **South Valley Utility Infrastructure Project Biological Resources Assessment (UES 2024a):** provided biological resources information for the Project
- **USFWS Information for Planning and Consultation (IPaC) data obtained on February 19, 2026 (USFWS 2026):** provided an updated list of federal listed, proposed, and candidate species with potential to occur in the Project site
- **Panorama site visit on January 22, 2026:** provided ground-truthed information on the vegetation communities, habitat, and species present onsite

3.5.2 Existing Setting

Existing Site Conditions

This section describes the vegetation communities, plants, and wildlife species present, or potentially present during the 2024 site visit, within the 37.4-acre Project site. As of the 2026 site visit, the entire Project site has been graded using cut and fill rough grading methods under a grading permit issued for the overall data center development. As a result, the Project site has been compacted and leveled, resulting in the removal of all vegetation and the underlying seed bank.

Due to these prior ground disturbing activities, the Project site currently provides little to no habitat value for plant or wildlife species. The topography in these areas is characterized by gentle to steep slopes. Areas of talus or gravel overlay are interspersed throughout the

vegetated landscape. Although ephemeral drainages are present within the Project site, no surface water was observed during the January 2026 site visit.

Evidence of past disturbances, including historic wildfire (the 1985 Gooseberry Fire), cattle grazing (as indicated by dried cow patties observed onsite), and mining activities (as indicated by waste rock piles and collapsed support structures observed onsite) was noted in the surrounding area (UES 2024a). Data from the USGS Mineral Resources Data System and the NBMG indicate the potential presence of numerous mining prospects within and adjacent the northern portion of the Project site (UES 2024a). In addition, the Panorama biologist observed several areas of soil disturbance consistent with large, tracked vehicles.

Biological surveys were conducted in July 2024 prior to site grading, at which time vegetation communities and associated habitats were present. These survey results are used to characterize pre-disturbance conditions and regional species potential outlined in this section; however, the site is currently disturbed and unvegetated due to the grading of the entire Project site. The impact analysis is based on current Project site conditions observed during the January 2026 site visit and evaluates Project effects relative to this baseline condition rather than the pre-disturbance environment documented during surveys conducted in July 2024.

Vegetation Communities

Vegetation communities described below reflect pre-disturbance conditions documented during biological surveys conducted prior to site grading. Vegetation communities in the Project site most closely correspond to LANDFIRE's Great Basin Xeric Mixed Sagebrush Shrubland and Great Basin Pinyon-Juniper Woodland community types (U.S. Department of Agriculture (USDA) 2025). Although juniper woodland was present, no pinyon pine (*Pinus monophylla*) trees were observed within these stands, which were dominated by Utah Juniper (*Juniperus osteosperma*). These LANDFIRE vegetation community types are consistent with the NDOW Key Habitats Low Elevation Sagebrush Dominated Shrubland and Pinyon-Juniper Woodland (NDOW 2022). Both vegetation communities are common within the Basin and Range physiographic province of northern Nevada.

The shrubland and woodland communities in the Project site are dominated by sagebrush species (*Artemisia* spp.). Common shrubs in the understory included broom snakeweed (*Gutierrezia sarothrae*), a woody subshrub species, and rabbitbrush (*Chrysothamnus* spp. or *Ericameria* spp.). Less common shrubs included ephedra species (*Ephedra nevadensis* or *Ephedra viridis*) and antelope bitterbrush (*Purshia tridentata*). The herbaceous layer is characterized by bunch grasses, an unidentified, but common, spreading ground cover plant, and various common forbs, including a buckwheat species (*Eriogonum* sp.). Additional plant species may be present, but were not detected during the January 2026 site visit, which occurred outside of the blooming period. The invasive annual grass, cheatgrass (*Bromus tectorum*), was observed at low density in the site; no large or dense infestations were noted.

No sensitive habitats were observed within the Project site. Sensitive habitats are either (1) recognized by the NDNH or USFWS as being locally depleted, (2) considered regionally rare by

experts, (3) known to support special status species, or (4) known to serve as important wildlife corridors.

Special Status Plants

A USFWS IPaC query for the Project site did not identify any special status plant species with potential to occur (USFWS 2026). However, the South Valley Utility Infrastructure Project Biological Resources Assessment (UES 2024a) identified three special status plant species as having a "Possible" potential to occur in the Project site. These included two species identified by the NDNH as vulnerable, Lemmon buckwheat (*Eriogonum lemmonii*) and Nevada suncup (*Eremothera nevadensis*), and one identified as imperiled, Tiehm peppercress (*Lepidium tiehmii*).

These species were determined to have suitable habitat within the Project site, and documented occurrences are located approximately 3 to 10 miles from the Project site (see Table 4 in the South Valley Infrastructure Project Biological Resources Assessment [UES 2024b]). No special status plant species were observed during the July 2024 site visit conducted by a UES biologist (UES 2024a). Table 7 summarizes all special status plant species evaluated for the Project in UES's Biological Resources Assessment (UES 2024a) and presents the determinations regarding their potential to occur within the Project site.

Table 7 Special Status Plant Species with Potential to Occur in the Project Site

Species	Status[a]	Habitat	Potential to Occur in the Project Site
Churchill Narrows buckwheat *Eriogonum diatomaceum*	N-P, N-CE	Occurs on small patches of diatomaceous clay soil in a localized area of less than 10 square kilometers in the Churchill Narrow area of Lyon County, Nevada.	**None.** There is no suitable habitat in the Project site and the Project site is outside the known range of the species.
Lemmon's buckwheat *Eriogonum lemmonii*	N-V	Occurs in bluffs and badlands on open, light-colored soil.	**Possible.** Suitable habitat is present in the Project site and occurrences have been documented less than 10 miles away.
Monte Neva Indian-paintbrush *Castilleja salsuginosa*	N-P, N-CE	Occurs in alkaline soils of travertine hot springs. Only known from two areas – one in White Pine County and one in Eureka County.	**None.** There is no suitable habitat in the Project site and the Project site is outside the known range of the species.
Nevada suncup *Eremothera nevadensis*	N-V	Occurs in open, sandy, gravelly, or clay slopes and flats in desert scrub habitat.	**Possible.** Suitable habitat is present in the Project site and occurrences have been documented less than five miles away.
Osgood Mountains milketch *Astragalus yoder-williamsii*	N-P, N-CE	Occurs on dry, cold ridge crests, stony flats, and disturbed roadbeds, often in sagebrush communities. Only known from locations in southwestern Idaho, Oregon, and one site in northern Nevada.	**Unlikely.** There is limited suitable habitat in the Project site, but known occurrences are more than 50 miles away.

Species	Status[a]	Habitat	Potential to Occur in the Project Site
Sodaville milkvetch *Astragalus lentiginosus* var. *salinus*	N-P, N-CE	Occurs in powdery clay saline soils near springs and moist alkaline flats. Only known occurrences are in Mineral and Nye counties, Nevada and Inyo County, California.	**None.** There is no suitable habitat in the Project site and the Project site is outside the known range of the species.
Tiehm's peppercress *Lepidium tiehmii*	N-I	Occurs in dry, open, rocky clasy soils or in soil pockets in or near scree, talus, or boulder fields derived from basalt, other volcanic rocks, and/or fluviolacustrine sediments. Occurs on gentle to seep slopes, often in sagebrush, shadscale, and juniper woodland zones.	**Possible.** Suitable habitat is present in the Project site and occurrences have been documented approximately three miles away to the southwest.
Ute lady's tresses *Spiranthes diluvialis*	N-P, N-CE	Occurs in various types of moist environments, such as wetlands, meadows, and floodplains.	**None.** There is no suitable habitat in the Project site.
William's combleaf *Polyctenium williamsiae*	N-P, N-CE	Occurs in shallow soil on basalt and gravelly substrates in mud flats, dry meadows, sagebrush areas, and edges of vernal pools. Known from Washoe County, Nevada, and in various locations in California and Oregon.	**Unlikely.** There is limited suitable habitat in the Project site, but known occurrences are approximately 20 miles away.

Notes:

[b] Conservation Status codes: N-P = Nevada Protected; N-CE = Nevada Critically Endangered; NI = Nevada Imperiled; N-V = Nevada Vulnerable.

Habitats within the Project site could support three special status plant species identified as having potential to occur within the Project site: Lemmon's buckwheat, Nevada suncup, and Tiehm's peppercress (UES 2024a). Although no special status plants were observed during the 2024 blooming season site visit conducted by the UES biologist, the effort did not constitute a protocol level or comprehensive botanical survey. Therefore, the potential for these species to occur in unsurveyed portions of the site cannot be ruled out.

Cacti and Yucca

Cacti and yucca species are not special status plants in the same sense as those listed by the State of Nevada or the USFWS. However, all cacti and yucca are protected by the State of Nevada, and a permit is required if any are to be harmed or removed on public land. Removal is allowed on private land with the written permission of the landowner (Nevada Revised Statute [NRS] 527.100). One unidentified cactus individual was observed in an adjacent area during the January 2026 site visit, and additional individuals may be present in areas that were not directly surveyed.

General Wildlife

General wildlife species that are known to occur within the Low Elevation Sagebrush Dominated Shrubland and Pinyon-Juniper Woodland habitats and within the vicinity of the Project site include black-tailed jackrabbit (*Lepus californicus*), coyote (*Canis latrans*), wild horse (*Equus caballus*), pronghorn antelope (*Antilocapra americana*), mule deer (*Odocoileus hemionus*), Great Basin collared lizard (*Crotaphytus bicinctores*), western fence lizard (*Sceloporus occidentalis*), long-nosed leopard lizard (*Gambelia wislizenii*), various common bird and raptor species, such as common raven (*Cornus corax*), rock wren (*Salpinctes absoletus*), and red-tailed hawk (*Buteo jamaicensis*), and other common small mammal and reptile species. Some of these species were confirmed to be present by their sign (scat and tracks) during the Panorama site visit in January 2026.

The Low Elevation Sagebrush Dominated Shrubland and Pinyon-Juniper Woodland habitats within the Project site provide suitable habitat for the general wildlife species listed above. Several wildlife species were confirmed to be present in the vicinity of the Project site during the January 2026 site visit based on observed wildlife sign, although no individual animals were directly observed. Documented wildlife signs included scat and other evidence attributable to wild horses, black-tailed jackrabbit, and woodrat (*Neotoma* sp.). Wild horse scat was abundant throughout the area. Tracks of an unknown even-toed ungulate, possibly mule deer or pronghorn antelope, were observed in an ephemeral drainage. Only a few small burrow holes were observed; however numerous areas of mounded soil, likely resulting from fossorial mammal activity (such as ground squirrel [*Urocitellus* sp.]) were present. This suggests that additional burrows could be constructed during the animals' active season. Although no birds were observed during the site visit, shrub and the juniper trees onsite provide suitable nesting habitat for songbird species.

Migratory Birds, Including Raptors

Migratory birds are likely to occur within the Project site during the breeding season (March 1 through August 31). Trees and shrubs within the Project site may provide nesting substrate. The vegetation present onsite could provide suitable foraging opportunities for migratory birds by providing seeds or berries or habitat for insect prey species. Raptor species, including eagles, could use the habitat onsite for foraging. The vegetation present could provide shelter and foraging opportunities for small mammals, reptiles, and birds, which serve as prey species for raptors. Although, no raptors were observed during January 2026, site visit and no suitable nesting habitat for raptors exists within the Project site, raptors could nest in the surrounding mountains and travel from those locations to forage within the site. Trees within or directly adjacent to the Project site could provide perches for hunting raptors.

Special Status Wildlife

Special status wildlife species were considered to have potential to occur in the Project site if their known geographic and elevational ranges overlap the Project site and suitable habitat is present in the Project site or in the immediate vicinity. The IPaC query for the Project site identified three federal special status species as potentially occurring (USFWS 2026): northwestern pond turtle (*Actinemys marmorata;* proposed Threatened); cui-ui (*Chasmistes cuju;*

Endangered); and monarch butterfly (*Danaus plexippus Plexippus*; proposed Threatened). No suitable aquatic habitat for northwestern pond turtle or cui-ui occurs within the Project site. Cui-ui is endemic to Pyramid Lake in northern Nevada and there is no potential for either aquatic species to occur onsite.

Monarch butterfly relies on milkweed plants (*Asclepias* sp.) for breeding. Milkweed was not observed on the Project site during site visits conducted in July 2024 and January 2026. However, milkweed could occur within the ephemeral washes in the Project site. Therefore, monarch butterflies could breed onsite if milkweed is present and potentially utilize nectar resources within the Project site for foraging.

These species along with other special status species identified by UES as potentially occurring within the Project site, are discussed in detail in Table 8. In total, 15 special status wildlife species are either known to be present or have a "Possible" potential to occur in the Project site. Five of these species are bats, all of which are protected under Nevada State law. Bats could forage within the Project site and may roost in trees, abandoned mine features, or cliff habitat located within or adjacent to the Project site.

The greater sage-grouse (*Centrocercus urophasianus*) is a Nevada protected game bird. It is a sagebrush obligate species that uses a variety of sagebrush habitats and is often near meadows. Potentially suitable sagebrush habitat is present onsite, but no active leks occur within the Project site or surrounding four-mile buffer and no radio-tagged birds have been detected in the Project site or its surrounding four-mile buffer (UES 2024a). The nearest Greater Sage-Grouse Habitat Management Area is located approximately 4 miles north of the Project site and is classified as Other Management Area (UES 2024a).

Table 8 Special Status Wildlife Species with Potential to Occur in the Project Site

Species	Status[a]	Habitat	Potential to Occur in the Project Site
Birds			
Northern goshawk *Accipiter gentilis*	N-S	Associated with riparian aspen stands. Forages in open sagebrush adjacent to mature forest stands.	**Nesting – None. Foraging – None.** No suitable habitat is present.
Golden Eagle *Aquila chrysaetos*	BGEPA	Occurs in a wide range of habitats throughout Nevada, where it primarily nests on cliff ledges and sometimes large trees.	**Nesting – None, Foraging – Possible.** There is no suitable nesting habitat, but there is suitable foraging habitat and individuals may be present while hunting. Nests are documented within 10 miles of the Project site (UES 2024a).
Greater sage-grouse *Centrocercus urophasianus*	N-P Game Bird	Sagebrush obligate species that uses a variety of sagebrush habitats and is often in close proximity to meadows.	**Nesting – None. Foraging – None.** Sagebrush habitat is present in the Project site, but no managed leks are present and no radio-tracked birds have been recorded in the Project site or surrounding four-mile buffer (UES 2024a).

Species	Status[a]	Habitat	Potential to Occur in the Project Site
Yellow-billed cuckoo *Coccyzus americanus*	F-T; N-S	Requires riparian habitat with dense woody vegetation. Usually nests in willow trees, but forages in cottonwood trees. Currently only found in a few localities in southern Nevada.	**Nesting – None. Foraging – None.** No suitable habitat is present and the Project site is far outside the current known range of the species.
Prairie falcon *Falco mexicanus*	N-S	Occupies cliff habitat, shrublands, and grasslands, nesting in rocky crevices and cliffs. Forages in wide open habitats that include shrublands, prairies, and agricultural fields.	**Nesting – None. Foraging – Possible.** There is no suitable nesting habitat, but there is suitable foraging habitat and individuals may be present while hunting.
Peregrine falcon *Falco peregrinus*	N-E	Occurs in open environments, usually in proximity to suitable cliff nesting habitat.	**Nesting – None. Foraging – Possible.** There is no suitable nesting habitat, but there is suitable foraging habitat and individuals may be present while hunting.
Bald eagle *Haliaeetus leucocephalus*	N-E; BGEPA	Nests in tall trees or on cliffs near water bodies that provide a good source of fish and/or waterfowl for prey.	**Nesting – None. Foraging – Unlikely.** No suitable habitat is present, but individuals may fly overhead.
Loggerhead shrike *Lanius ludovicianus*	N-P, N-S	Occupies intermountain cold desert shrub habitats, breeding in open habitat with scattered trees and shrubs. Nests in shrubs and small trees.	**Nesting – Present. Foraging – Present.** Suitable habitat is present onsite and the species was observed during the site visit in July 2024 (UES 2024a).
Sage thrasher *Oreoscoptes montanus*	N-S	Occupies cold desert shrub habitat, breeding and foraging in tall sagebrush-bunchgrass communities.	**Nesting – Possible. Foraging – Possible.** Suitable habitat is present onsite.
Brewer's sparrow *Spizella breweri*	N-S	Occurs in intermountain cold desert shrub and sagebrush habitats, preferring areas with scattered shrubs and short grass. Nests in sagebrush or other shrubs.	**Nesting – Possible. Foraging – Possible.** Suitable habitat is present onsite.

Species	Status[a]	Habitat	Potential to Occur in the Project Site
Invertebrates			
Monarch butterfly *Danus plexippus plexippus*	F-PT	Occurs throughout Nevada, which is part of the species' spring and summer range. Dependent on milkweed or dogbane (*Apocynaceae*) as host plants for breeding. Forages on these and other flowering plants.	**Possible.** Milkweed plants could be present within ephemeral drainages in the Project site and individuals could breed on these plants; individuals could also fly through the area while foraging.
Mammals			
Pronghorn antelope *Antilocapra americana*	N-P Big Game Species	Occurs throughout mountainous areas of northern and central Nevada, where it is found primarily in open terrain.	**Possible.** Suitable habitat is present and observations within 10 miles have been made.
Pallid bat *Antrozous pallidus*	N-P	Occurs in pinyon-juniper woodland, sagebrush, and desert scrub habitats. Roosts in various habitats, including rock outcrops, mines, caves, trees, buildings, and bridges.	**Possible.** Suitable foraging habitat is present and roosting habitat may be present in or near the Project site in the form of abandoned mine features, rock outcrops, trees, and buildings.
Townsend's big-eared bat *Corynorhinus townsendii*	N-P	Occurs in multiple habitat types throughout Nevada, including deserts, and is strongly associated with cave or abandoned mine features. Year-round resident in Nevada.	**Possible.** Suitable foraging habitat in the form of juniper woodland is present and roosting habitat may be present in or near the Project site in the form of abandoned mine features.
Spotted bat *Euderma maculatum*	N-P; N-T	Occur in woodlands, cliff and canyon habitat, and desert landscapes. Roosting is associated with cliff or prominent rock features. May occasionally roost in mines and caves.	**Possible.** Suitable cliff habitat for roosting may be present around the Project site and the species is known to travel long distances to forage (and foraging habitat is present onsite).
Fringed bat *Myotis thysanoides*	N-P	Roosts in abandoned mines, caves, trees, and buildings. Forages in a range of habitats, including desert scrub.	**Possible.** Suitable foraging habitat is present and roosting habitat may be present in or near the Project site in the form of abandoned mine features, trees, and buildings.

Species	Status[a]	Habitat	Potential to Occur in the Project Site
Mule deer *Odocoileus hemionus*	N-P Big Game Species; N-PS	Widespread in Nevada; associated with sagebrush steppe, aspen, and mountain shrub communities.	**Present.** Suitable habitat is present, and this species was observed during the site visit in July 2024 (UES 2024a).
Bighorn sheep *Ovis canadensis*	N-P Big Game Species; N-PS	Occupies meadows, mountain slopes, and foothills. Requires rocky slopes for escape habitat from predators.	**Possible.** Suitable habitat is present west of the site and drainages within the site could draw sheep to the area for drinking when water is flowing.
Brazilian (Mexican) free-tailed bat *Tadarida brasiliensis*	N-P	Occurs in multiple habitats, including arid deserts and mountains. Roosts in various habitats, including cliffs, mines, caves, trees, buildings, and bridges.	**Possible.** Suitable foraging habitat is present and roosting habitat may be present in or near the Project site in the form of abandoned mine features, rock outcrops, trees, and buildings.
Reptiles			
Northwestern pond turtle *Actinemys marmorata*	F-PT	Habitat includes permanent and intermittent waters of rivers, creeks, small lakes and ponds, marshes, irrigation ditches, and reservoirs.	**None.** No suitable habitat is present.
Fish			
Cui-ui *Chasmistes cujus*	F-E; N-E	Endemic to Pyramid Lake and the Lower Truckee River in Nevada.	**None.** No suitable habitat is present and the Project site is not within the current known range of the species.

Notes:

[a] Conservation Status codes: BGEPA = Bald and Golden Eagle Protection Act; N-E = Nevada Endangered; N-P = Nevada Protected; N-S = Nevada Sensitive; N-PS = Nevada Priority Species; F-T = Federal Threatened; F-PT = Federal Proposed Threatened.

3.5.3 Environmental Consequences

Vegetation

The Project site has been entirely graded and does not support native vegetation or a viable seed bank. As such, no native vegetation communities are present, and the site does not provide meaningful vegetation value.

Because vegetation is absent across the Project site, the Project would not result in direct or indirect impacts to native vegetation communities. Ground-disturbing activities associated with

construction would occur within previously disturbed and compacted areas and would not result in additional loss of vegetation resources.

Temporary impacts would occur within construction work areas and staging areas used for Project activities which have been previously graded and does not support vegetation or a viable seed bank. No temporary impacts to vegetation resources would occur, and revegetation of temporary disturbance areas would be limited to stabilization and site management objectives rather than restoration of native plant communities. Temporary impacts would be minimized through implementation of the measures described in Section 3.5.4, including confining activities to clearly delineated work areas; restricting vehicles, equipment, and pedestrians to prove roadways and work areas; limiting overland travel; providing Working Environmental Awareness Program (WEAP) training to personnel; restoring temporary work areas following construction (including grading, soil stabilization, soil compaction, and revegetation in accordance with the Project's SWPPP); maintaining erosion and sediment control measures until revegetation success criteria are achieved; implementing dust control measures; and implying invasive species prevention and control BMPs. With implementation of these measures, temporary impacts to vegetation diversity, structure, and ecosystem function would be minor.

Construction and operation activities could result in indirect impacts; however, because vegetation is absent from the Project site, these effects (e.g., fugitive dust, runoff, or herbicide drift) would not affect on-site vegetation resources. Implementation of measures described in Section 3.5.4 would ensure indirect impacts remain minor.

Special Status Plants

Three special status plants have potential to occur within the Project site: Lemmon's buckwheat, Nevada suncup, and Tiehm's peppercress (Table 7); however, because the Project site has been previously graded and does not support vegetation or suitable habitat conditions, these species are not expected to occur within the Project site. Therefore, no impacts to special status plants would occur. Implementation of BMPs and WEAP training would further ensure inadvertent impacts do not occur. No state or federal permits or protocol level surveys are required. Impacts to special status plants would be minor.

Wildlife, Including Migratory Birds, Raptors, and Special Status Species

Construction would occur within a previously graded site that does not provide suitable habitat for wildlife species and has little to no habitat value. Because no intact vegetation communities or habitats are present, construction would not result in the loss of natural habitat within the Project site. Temporary disturbance associated with construction would occur in already disturbed areas and would not measurably affect habitat availability.

Indirect habitat impacts (e.g., dust, erosion, wildfire risk, and invasive species introduction) would be minimized through implementation of dust control, erosion control, fire prevention, and invasive species management measures would reduce these impacts to a level that is not adverse.

Construction activities could result in limited direct impacts to transient wildlife (e.g., individuals moving through the site), including potential injury or mortality, vehicle strikes, nest destruction, entrapment in excavations or pipes, disturbance from noise and vibration, and attraction of predators to construction-related food sources. However, given the lack of suitable habitat, wildlife use of the Project site is expected to be minimal and infrequent. Additionally, the Project would implement wildlife protection measures described in Section 3.5.4 to further reduce impacts to wildlife. These include, but are not limited to: restricting work to clearly marked disturbance areas; limiting overland travel; enforcing onsite speed limits (25 miles per hour during the day and 15 miles per hour at night); conducting preconstruction migratory bird clearance surveys during the breeding season (March 1 through August 31) and establishing avoidance buffers as necessary; covering or securing open trenches, holes, and pipes overnight or providing escape ramps; inspecting stockpiled soils and equipment for wildlife prior to disturbance; properly containing and removing food waste; minimizing nighttime work and lighting to the extent practicable; and providing WEAP training to all personnel. With implementation of these measures, construction-related impacts to wildlife, including migratory birds, raptors, and special status species, would be minor.

Operational impacts (e.g., vehicle collisions, herbicide drift, wildfire risk, and bird collisions or perching on structures, would be limited due to the absence of habitat and low likelihood of wildlife use. Additionally, with the implementation of measures described in Section 3.5.4, operational impacts would not be adverse.

Migratory bird and raptor species could be affected by construction and operation in the same ways described above for general wildlife; however due to the absence of suitable habitat within the Project site, occurrences expected to be low. Implementation of avoidance, minimization, and monitoring measures described in Section 3.5.4 would reduce impacts to minor levels.

Seven special status wildlife species have the potential to occur in the surrounding region (Table 8); however, the Project site does not provide suitable habitat. With implementation of measures described in Section 3.5.4, impacts to special status wildlife species would be minor.

3.5.4 Mitigation and Other Resource Protection Measures

Vegetation and Wildlife Habitat

Construction

The following measures will be implemented to reduce construction impacts on vegetation and wildlife habitat:

- Construction personnel will receive WEAP training that will instruct them on how to minimize impacts to vegetation and wildlife habitat, including staying within defined work areas and making sure boots and equipment are cleaned before entering the site so as to prevent the spread of invasive species.

- The amount of vegetation impacted by the Project will be kept to the minimum necessary for Project implementation. Work areas will be visibly marked prior to construction. Work activities will only take place within these areas.
- Equipment, vehicles, and pedestrians will be restricted to approved roadways and work areas. Overland travel will be minimized to the extent possible.
- After completion of construction, temporary work areas will be restored to pre-Project conditions, including grading and contours. Restoration will include soil stabilization, soil decompaction, and revegetation. Revegetation will be considered successful when the species diversity and percent cover is within 70 percent of pre-Project conditions as determined by a qualified biologist. An adaptive management framework will be employed wherein revegetation methods will be adjusted as needed to ensure revegetation success. Revegetation will be completed per the requirements of the Project's SWPPP.
- Temporary erosion and sediment control measures will be maintained until vegetation has been successfully restored. See the previous measure for the standards of successful revegetation.
- Dust control methods will be used during construction to prevent fugitive dust.
- BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds will be implemented. Such measures will include, but will not be limited to, cleaning of equipment and vehicles prior to entering the site and promptly addressing infestations using appropriate control methods. Mechanical methods of removing and controlling weed infestations will be preferentially used over herbicides.
- If the use of herbicides for weed management is deemed necessary to control weed infestations, herbicide use will comply with State and County regulations and the product's label. Herbicides will not be used in windy conditions so as to prevent herbicide drift.

Operation and Maintenance

The following measures will be used to reduce operation and maintenance impacts on vegetation and wildlife habitat:

- Limited ground disturbing activities or overland vehicle travel will occur during operation and maintenance. If this is required, then measures for construction identified herein will be implemented to protect biological resources.
- BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds will be implemented. Such measures will include, but will not be limited to, cleaning of equipment and vehicles prior to entering the site and promptly addressing infestations using appropriate control methods. Mechanical methods of removing and controlling weed infestations will be preferentially used over herbicides.
- If the use of herbicides for vegetation and weed management is deemed necessary to control infestations, herbicide use will comply with State and County regulations and the product's label. Herbicides will not be used in windy conditions to prevent herbicide drift.

- Employees, contractors, and subcontractors will be prohibited from having pets, campfires, or firearms in the Project site. Smoking will be limited to designated areas away from flammable material.

Special Status Plants

Impacts on special status plants will be avoided or minimized with the implementation of the measures described above for vegetation and wildlife habitat. The following additional measure will provide increased protection for special status plants and will apply during construction.

- The WEAP training received by all construction personnel (see above) will educate them on the special status plant species with potential to occur in the site and will include how to identify and avoid these plants. The training will cover steps to be taken to avoid harming these plants if the plant is in an area where avoidance is feasible. Such steps could include flagging or erecting a temporary exclusion barrier around the plant(s).

Wildlife, Including Migratory Birds, Raptors, and Special Status Species

Construction

The following measures will be used to reduce construction impacts on wildlife species, including migratory birds, raptors, and special status species:

- The WEAP training received by all construction personnel (see above) will educate them on the types of special status wildlife species with potential to occur in the site and how to identify and avoid them. Among other topics, the training will cover not harassing wildlife, preventing disturbance of nests and burrows, and what to do if a special status species is observed.
- Equipment, vehicles, and pedestrians will be restricted to approved roadways and work areas. Overland travel will be minimized to the extent possible.
- Vehicle and equipment operators will adhere to a 25 mile-per-hour speed limit or less, as determined appropriate by the site environmental health and safety manager, while onsite to avoid collisions with wildlife.
- At the beginning of each workday, construction personnel will check for wildlife beneath vehicles and equipment prior to moving or operating them. Any spaces within vehicles or equipment that an animal could get into will also be checked.
- Trash and waste, including food waste, will be properly contained and removed from the site so as to prevent food subsidies for predators.
- Construction activities will only occur during daylight hours (half hour after sunrise to half hour before sunset) in order to avoid the use of construction lighting during night and crepuscular periods. If an activity must occur outside of daylight hours, then the minimal amount of lighting necessary for safety will be used and vehicle speeds will be lowered to a maximum of 15 miles per hour to minimize potential for wildlife impacts.
- Noise from heavy equipment will be temporary during the construction of the Project. Once the facilities are in operation, noise will be minimal. If a nest or burrow is found that is occupied by a special status or otherwise protected species, including migratory birds, then the qualified biologist will determine an appropriate avoidance buffer size

that prevents noise disturbance. If noise disturbance cannot be avoided, then the qualified biologist will contact the USFWS and/or NDOW as appropriate to determine next steps.

- At the end of each workday, any open trenches, holes, or pipes will be covered to prevent wildlife entering them and becoming entrapped. Alternatively, escape ramps can be inserted into these features to allow wildlife to escape. If any of these features are discovered to not be in compliance with these measures at the beginning of a workday, it will be checked thoroughly for the presence of wildlife prior to the commencement of construction activities.
- Stockpiled soil will be inspected for wildlife prior to moving or disturbing the stockpile if the stockpile has been undisturbed for more than 24 hours or has been left undisturbed overnight. If wildlife are found in the stockpile, they will be allowed or encouraged to leave unharmed before the stockpile is disturbed.
- If construction activities commence during migratory bird nesting season (March 1 through August 31) or if work is halted for more than a week in an area, then a qualified biologist will conduct a preconstruction clearance survey to determine the presence of nests within the construction area. If active nests are found, the biologist will determine the appropriate methods needed to avoid disturbing the nest, including but not limited to establishing avoidance buffers. A biological monitor will monitor the nest progression until the young have fledged, at which point construction may continue within the nest avoidance buffer.
- If a previously undetected nest is observed in the work area during construction and could be impacted by Project activities, the construction contractor will cease work and contact the qualified biologist to determine the appropriate methods needed to avoid disturbing the nest. If the nest is active, a biological monitor will monitor the nest progression until the young have fledged, at which point construction may continue within the nest avoidance buffer. If the nest is inactive, a qualified biologist will oversee the removal of the nest.
- BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds will be implemented. Such measures will include, but will not be limited to, cleaning of equipment and vehicles prior to entering the site and promptly addressing infestations using appropriate control methods. Mechanical methods of removing and controlling weed infestations will be preferentially used over herbicides.
- If the use of herbicides for vegetation and weed management is deemed necessary, herbicide use will comply with State and County regulations and the product's label. Herbicides will not be used in windy conditions so as to prevent herbicide drift.
- Employees, contractors, and subcontractors will be prohibited from having pets, campfires, or firearms in the Project site. Smoking will be limited to designated areas away from flammable material.
- If a non-special status wildlife species is found onsite, work that could injure the animal will not commence until it leaves the area, either on its own or through encouragement.
- If a special status wildlife species is found onsite, a qualified biologist will be contacted immediately and any active construction in the vicinity of the animal will cease. The

animal will be allowed to leave the area passively. If the animal does not leave, then the qualified biologist will contact USFWS and/or NDOW as appropriate to determine next steps.

Operation and Maintenance
The following measures will be used to reduce O&M impacts on wildlife:

- Limited ground disturbing activities or overland vehicle travel will occur during operation and maintenance. If this is required, then measures for construction identified herein would be implemented to protect biological resources.
- Vehicle and equipment operators will adhere to a 25-mile-per-hour speed limit while onsite in order to avoid collisions with wildlife.
- Trash and waste, including food waste, will be properly contained and removed from the site so as to prevent food subsidies for predators.
- Anti-perching features will be installed on Project structures as needed to reduce the risk of avian harm with the facility and to reduce the potential for increased predation from avian species on prey animal populations.
- BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds will be implemented. Such measures would include, but would not be limited to, cleaning of equipment and vehicles prior to entering the site and promptly addressing infestations using appropriate control methods. Mechanical methods of removing and controlling weed infestations will be preferentially used over herbicides.
- If the use of herbicides for vegetation and weed management is deemed necessary, herbicide use will comply with State and County regulations and the product's label. Herbicides will not be used in windy conditions to prevent herbicide drift.

3.6 Cultural Resources

3.6.1 Existing Setting

NRS Chapter 383 establishes Nevada's framework for historic preservation and establishes the Nevada State Historic Preservation Office (SHPO) to administer the State's preservation programs, maintain an inventory of cultural resources, and coordinate with federal, State, tribal, and local agencies. NRS 381 provides specific protection for historic sites and requires immediate notification to SHPO when artifacts, human remains, or burial goods are discovered during construction or other ground disturbing activities. NAC 703.415 through 703.427 establishes the content and review requirements for UEPA applications and includes the obligation to evaluate environmental effects on cultural, archaeological, and historic resources.

The overall region played an important role in early exploration, attracting settlers to move west to California and Oregon. The area was developed for mining, cattle ranching, and farming during the settlement of the American West after the completion of the transcontinental railroad in 1869.

3.6.2 Environmental Consequences

Construction of the Project has the potential to impact cultural resources during ground disturbing activities. Direct impacts could occur if previously undiscovered cultural resources are encountered during grading, vegetation removal, road construction, and installation of the power generation facility. The entirety of the Project site has been graded and leveled under the grading permit received from Storey County for the overall data center Project, and no cultural resources were encountered during those activities. Based on the prior disturbance within most of the Project site, additional impacts to cultural resources are not anticipated. Other impacts, such as theft or vandalism could occur because of increased human presence, if cultural resources are discovered in the Project site. Potential effects would be minimized through implementation of cultural resource surveys, monitoring as appropriate, and the avoidance or mitigation measures for, any resources identified during construction.

Potential impacts that could occur during operational activities are minimal, since no new ground disturbance is expected during O&M.

3.6.3 Mitigation and Resource Protection Measures

As appropriate, the following cultural resource measures will be implemented:

- The WEAP will include identification of cultural resources and the procedures to implement if suspected resources are found.
- If any cultural resource artifacts, human remains, or burial goods are inadvertently discovered during construction, work will be halted immediately within a minimum distance of 300 feet from the discovery, and a professional archaeologist will be mobilized to the site to evaluate the find. Any potential resources will not be handled or moved. The professional archaeologist will then determine whether the find needs to be evaluated by a paleontologist or Native American representative. The appropriate specialist(s) will then make a determination of the significance of the find and the steps to be followed before proceeding with the activity. SHPO and appropriate Tribes will be notified and consulted on eligibility and suitable treatment options.

Due to the implementation of mitigation measures and compliance NRS and NAC regulations, the impact on cultural resources will be minimized.

3.7 Land Use

3.7.1 Existing Setting

Land use describes the ways in which the community utilizes land, including the applicable planning policies for Storey County. Storey County regulates land use within the Project site utilizing the Storey County Zoning Ordinance Chapter 17.35 and the Storey County Master Plan (Storey County 1999, 2024c). Storey County is divided into seven planning areas. The Project

site is within the McCarran Planning Area, which is approximately 85,573 acres or 50 percent of Storey County (Storey County 2024c).

The Project site is zoned as "I-2 Heavy Industrial" under the Storey County Zoning Ordinance Chapter 17.35 (Storey County 1999) and is subject to the Storey County Master Plan (Storey County 2024c) land use designation of "Industrial". The Project is consistent with the Storey County Master Plan goals and objectives.

Land use immediately adjacent to the Project site is currently Forestry, but is being transitioned to Industrial (Storey County 2024a, 2024b). The Project is surrounded by existing graded areas to the north, east, and west and undeveloped land to the south of the Project site. The approved Mackay switching station and a proposed new substation and high voltage direct current lines, are also currently under development.

3.7.2 Environmental Consequences

The Project would be suited with the uses described under the Heavy Industrial designation. The development of electric switching stations, substations, and transmission facilities is included in the Heavy Industrial zoning and would not require separate land use approval for construction of the power generation by the Storey County Planning Commission or the Storey County Board of Commissioners, but grading and building permits would still be required. The Project is consistent with the Storey County Master Plan goals and objectives. Additionally, the Project would not require the acquisition of rights-of-way or the displacement of any existing businesses or residences; therefore, no impacts to land use are anticipated.

3.7.3 Mitigation and Resource Protection Measures

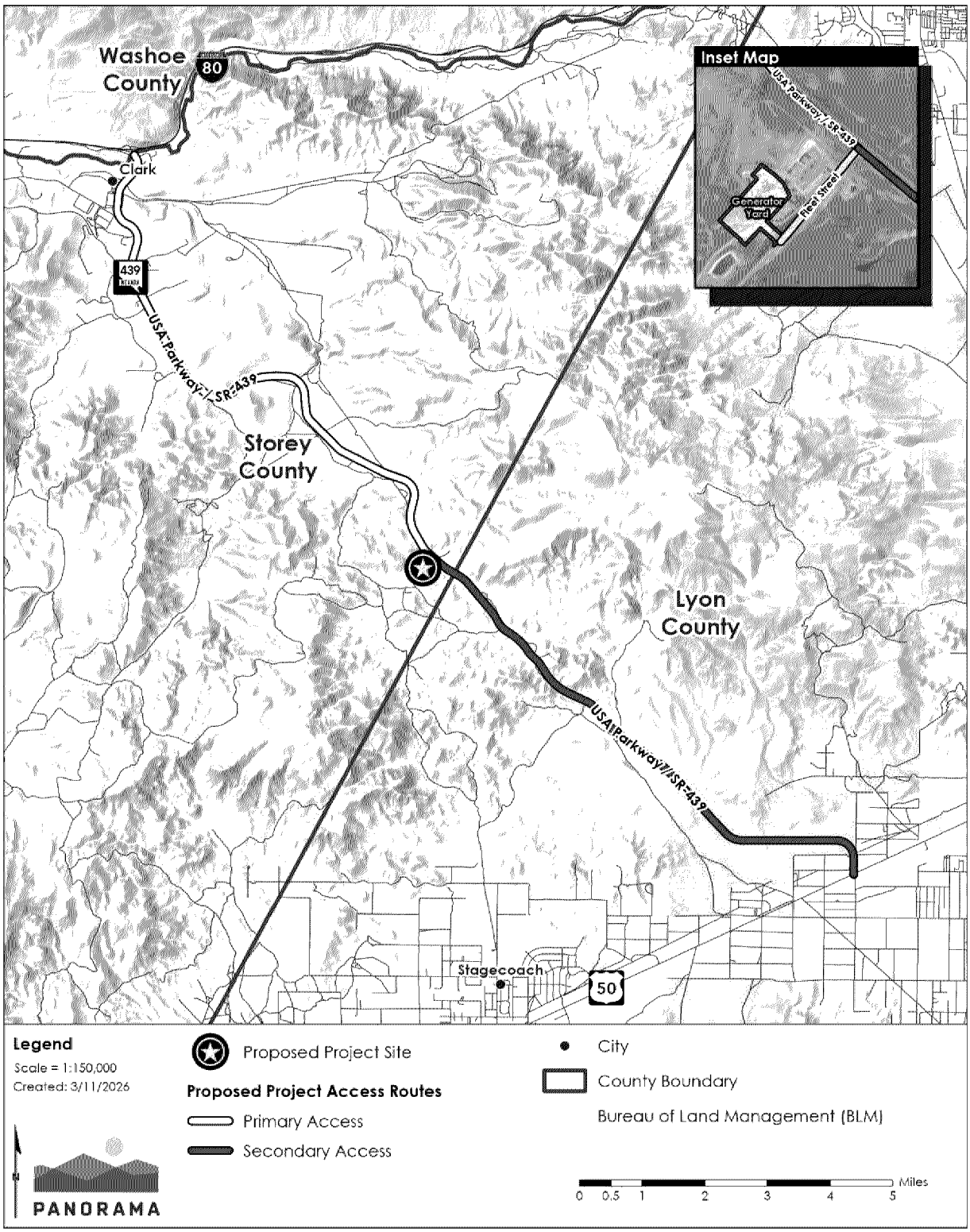
The Project is consistent with the established goals, objectives, and policies of Storey County as codified in the Official Zoning Ordinance of Storey County, Nevada – Title 17, Storey County Master Plan. The Project would not impact current or known future land use activities in the area; therefore, no mitigation or other resource protection measures are proposed.

3.8 Transportation

3.8.1 Existing Setting

In Storey County, transportation planning is guided by the Storey County Master Plan, which outlines goals, policies, and infrastructure classifications for regional mobility. The plan identifies key corridors such as Interstate 80 (I-80) and USA Parkway, which serve as primary access routes to the Project site. U.S. Route 50 (US 50) would serve as secondary access to USA Parkway and the Project site (Figure 7). The Nevada Department of Transportation (NDOT) coordinates with local agencies to ensure compliance with federal and State regulations.

Figure 7 Access Route to the Project Site from I-80



The Project site is located approximately 27 miles southeast of Reno, Nevada and approximately 12 miles northwest of Silver Springs, Nevada. During construction and operation, the Project site would be accessed via Fleet Street from I-80 or US 50 to USA Parkway (Figure 7). USA Parkway and US 50 are identified as a Principal Arterial: Other roadway type by the NDOT Functional System Map (NDOT 2025). Fleet Street is not included in the NDOT Functional System Map. The Project site is located approximately 10.4 miles south of the I-80 and USA Parkway interchange and approximately 9.4 miles northwest of the US 50 and USA Parkway interchange.

All roadways used to access the Project site are paved except Fleet Street, which is unpaved. Average annual daily traffic (AADT) counts for I-80, US 50, and USA Parkway, from the Traffic Records Information Application (TRINA), are included in Table 9 (NDOT 2024). Traffic on Fleet Street is anticipated to be nominal.

Table 9 Annual Average Daily Traffic Counts at Roadways Near the Project Site

Count Station Location	Station ID	Station Type	AADT (2024)
315 ft South of I-80 USA Parkway Interchange	0311077	Short-term	24,100
Eastbound off-ramp of the USA Parkway Interchange - Exit 33	0311073	Short-term	10,300
USA Parkway, 1.1 Miles North of US 50	0193140	Permanent	5,500

Source: (NDOT 2024)

3.8.2 Environmental Consequences

Construction

Traffic associated with Project construction would include passenger vehicles and heavy vehicles to supply concrete, construction materials, and equipment. During construction, the Project would generate approximately 90 daily vehicle trips (DVT), including 40 passenger vehicles and 50 heavy trucks, at the I-80/USA Parkway interchange, along USA Parkway near Exit 33 north of the Project site, and along USA Parkway south of the Project site near US 50. This represents an increase of approximately 0.4 percent of existing I-80 volumes (24,000 AADT), approximately 0.9 percent of USA Parkway volumes near Exit 33 (10,300 AADT), and approximately 1.6 percent of USA Parkway volumes near USA Parkway north of US 50 (5,500 AADT). While a portion of the passenger-vehicle trips may occur during the morning and evening commute periods, the resulting increase in traffic, which is in the order of only a few vehicles per hour per lane even during peak hours, remains far below thresholds that would measurably affect Highway Capacity Manual performance metrics such as density on the freeway or control delay at ramp terminals.

The incremental heavy truck component, approximately 0.2 to 0.9 percent of total traffic, would not materially alter heavy-vehicle proportions, operating speeds, or queuing conditions. Given the small magnitude of change relative to existing traffic and available capacity, trips associated with the Project would not result in a discernible change in operations or Level of Service (LOS) on I-80 or USA Parkway and therefore do not constitute a significant traffic impact. Fleet Street is expected to be able to support construction traffic as the road is currently used for access to existing construction areas. Impacts would be temporary and minor.

Following grading and preparation of the Project site, approximately 113 heavy duty trucks would deliver the J420 engines and associated equipment. This would be a one-time occurrence, and trucks would use the same routes to the Project site. This represents an increase of approximately 0.5 percent of existing I-80 volumes (24,000 AADT), approximately 1.1 percent of USA Parkway volumes near Exit 33 (10,300 AADT), and approximately 2.1 percent of USA Parkway volumes near USA Parkway north of US 50 (5,500 AADT). Impacts would be temporary and minor.

Operation and Maintenance

During O&M, the Project would generate approximately 20 DVT of heavy trucks delivering LNG tanks, at the I-80/USA Parkway interchange and along USA Parkway near Exit 33 north of the Project site. This represents an increase of approximately 0.1 percent of existing I-80 volumes (24,000 AADT), 0.2 percent of USA Parkway volumes near Exit 33 (10,300 AADT), and approximately 0.4 percent of USA Parkway volumes near USA Parkway north of US 50 (5,500 AADT).

Delivery of the LNG tanks would occur over a 24-hour period resulting in about one additional truck per hour over the 3-year operating period. This increase in heavy truck traffic remains far below thresholds that would measurably affect Highway Capacity Manual performance metrics such as density on the freeway or control delay at ramp terminals. Additionally, the incremental increase in heavy trucks would not materially alter heavy-vehicle proportions, operating speeds, or queuing conditions. Given the small magnitude of change relative to existing traffic and available capacity, trips associated with the Project would not result in a discernible change in operations or LOS on I-80, USA Parkway, or US 50 and therefore do not constitute a significant traffic impact. Fleet Street is expected to be able to support O&M traffic. Impacts would be temporary and minor.

3.8.3 Mitigation and Resource Protection Measures

The Project would not substantially impact current traffic conditions and transportation networks in the area; therefore, no mitigation measures or other resource protection measures are proposed.

3.9 Visual Resources

3.9.1 Existing Setting

The term visual character refers to the overall visual appearance of a given landscape based on the visual aspects of the landscape's vegetation, landforms/water, and human-made modifications. Visual impacts are considered in the UEPA process when utility-scale projects may alter the scenic character of rural or natural landscapes.

The Project site is designated as Heavy Industrial and is surrounded by vacant land designated as Forestry (Storey County 2024a). The terrain surrounding the Project site includes disturbed areas and hills.

The vegetation in areas that have not been disturbed are generally characterized as vegetation communities in the Project site most closely correspond to LANDFIRE's Great Basin Xeric Mixed Sagebrush Shrubland and Great Basin Pinyon-Juniper Woodland community types (USDA 2025). The herbaceous layer is characterized by bunch grasses, an unidentified, but common, spreading ground cover plant, and various common forbs, including a buckwheat species (UES 2024a).

During a site visit conducted on January 22, 2026, the photo below was taken to establish the viewshed and viewer groups that could be potentially impacted by the Project. As previously stated, the Project site is graded as part of the larger data center campus development and thus appears altered from a natural state. The viewer group most impacted by the Project includes travelers on USA Parkway.

3.9.2 Environmental Consequences

The Project is compatible with the Storey County Master Plan (Storey County 2024c). The proposed South Valley gas generation site would be visible to travelers from USA Parkway but would be consistent with future surrounding development and consistent with existing facilities and infrastructure in the greater region (i.e. TRI Center).

During construction, contrasting colors of vehicle and equipment movements from construction areas would be visible to viewer groups in the area; however, these activities are consistent with existing activities associated with the ongoing data center development. Visual impacts from construction would be short-term and minimal, occurring only during the construction period.

During operations, the gas generation site has the potential to be visible to travelers; however, the Project components are consistent in character with existing and future infrastructure in the area and would be consistent with the industrial setting. Impacts during operations would be minimal.

3.9.3 Mitigation and Resource Protection Measures

The Project would not impact current visual resources in the area; therefore, no mitigation measures or other resource protection measures are proposed.

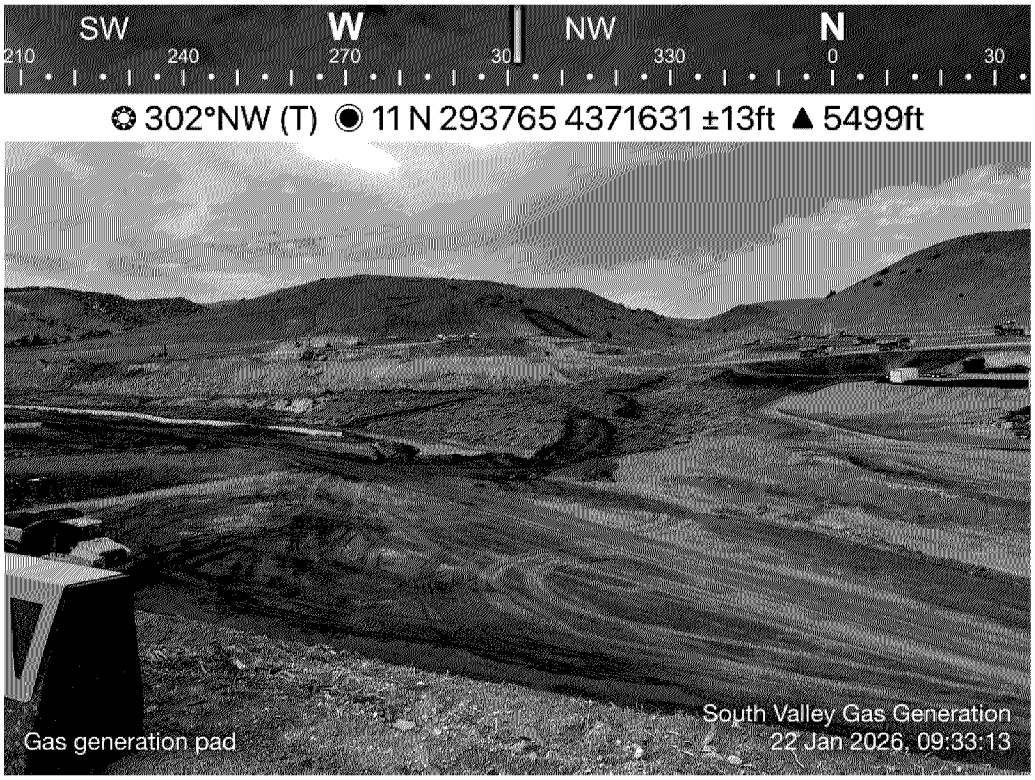


Photo 1. View from private access road (Fleet Street) facing northwest towards the proposed South Valley Gas Generation site and associated data center development area.

3.10 Noise

3.10.1 Overview

This section describes noise in relation to construction and operation of the Project, including a review of existing noise levels, how the noise generated by the Project would impact sensitive receptors, and any necessary mitigation measures to reduce impacts. Sensitive receptors are areas where humans or wildlife would be particularly affected by an increase in noise.

Noise is considered a subset of sound that is generally perceived as loud, unpleasant, unexpected, or undesired. Typical effects on humans from increased environmental noise include irritability, stress, and lack of sleep. Effects on wildlife include disorientation, stress, area avoidance, altered behavior patterns, and physiological and fitness effects. The intensity of these effects depends on the loudness, pitch, and duration of the sound.

Sound is measured in decibels (dB), which is a logarithmic scale in which the general rule of thumb is that a 10-dB increase in sound is perceived as a doubling of loudness by the human ear. Changes of 1 dB are generally imperceptible to the human ear, but changes of 5 dB are clearly noticed.

Noise is often characterized using A-weighted decibels (dBA), which emphasizes the sound frequencies to which human ears are more sensitive (middle frequencies) and deemphasizes the sound frequencies to which human ears are less sensitive (high and low frequencies). For reference, the sound levels in a normal human conversation range from 60 to 65 dBA, quiet suburban neighborhoods typically have ambient noise levels of 40 to 50 dBA, and neighborhoods near arterial streets have ambient noise levels of 50 to greater than 60 dBA.

Sound from localized sources (point sources) spreads out as it travels through the air, dropping in loudness (attenuating) at a rate of 6 dBA for each doubling of distance. Sound from line sources, such as a highway, typically attenuate at a rate of 3 dBA for each doubling of distance or 4.5 dBA if the substrate between the line source and the sound receptor helps to dampen sound, such as vegetation. Solid structures, such as buildings or raises in topography, that block the line of sight between a noise source, and a receptor also increase the rate of sound attenuation.

3.10.2 Existing Setting

The Project site is located approximately 27 miles southeast of Reno, Nevada, and approximately 9 miles south of I-80. The Project site is situated southwest (0.4 mile) of USA Parkway in a remote area currently being developed for Heavy Industrial use. The Project site is within a data center development area that is currently under construction. The current noise environment in and around the Project site consists primarily of active traffic noise from USA Parkway and ongoing construction activities associated with development of the surrounding industrial facilities. Typical ambient noise levels in active construction sites range from approximately 80 to 90 dB during daytime hours (American Society of Safety Professionals 2020). The nearest sensitive receptors are residences in the community of Stagecoach, Nevada, located approximately 4.5 miles south of the Project site. Due to this substantial distance and the intervening industrial land uses, these receptors experience limited influence from noise generated within the Project site. Stagecoach, Nevada, located approximately 4.5 miles south of the Project site.

3.10.3 Environmental Consequences

Construction

Construction of the Project would involve the use of noise-generating equipment such as trucks, generators, compressors, and earthmoving equipment. Construction-related noise would be temporary and would occur primarily during site preparation, equipment installation, and material delivery activities.

The Project site is located within an area undergoing active industrial development where similar construction activities already contribute to the daytime noise environment. Project construction would occur during the same hours as other construction activities in the surrounding area and would therefore be consistent with existing noise conditions.

Construction is expected to occur up to 10 hours per day, six days per week, typically between 7:00 a.m. and 5:00 p.m., Monday through Saturday. These hours fall within the Storey County exemption period for construction activities, which allows construction noise between 7:00 a.m. and 7:00 p.m., except Sundays and federal holidays.

Because construction noise would be temporary, would occur during daytime hours, and would occur in an area where similar construction activities are already present, construction noise impacts would be short-term and minimal.

Operation and Maintenance

Noise generated by the Project during operation would primarily result from the operation of natural gas-fired Jenbacher J420 generators and limited diesel-powered equipment, including Tier 4 diesel generators used for emergency or temporary purposes.

Manufacturer-provided sound data indicate that individual gas-fired generators produce sound pressure levels of approximately 85 to 90 dBA at a distance of 1 meter from the unit (Aggreko 2024).

Operational noise levels were evaluated using the dBmap noise modeling platform in accordance with ISO 9613-2, an internationally accepted standard for predicting outdoor sound propagation. The model assumed simultaneous operation of all generators under conservative conditions and evaluated sound levels at a receptor height of 1.5 meters above ground surface. Noise modeling results indicate that predicted operational noise levels attenuate to below 55 dB(A) at 660 feet with all 90 J420 engines running (dbmap 2026). These levels are consistent with typical ambient noise levels expected within an industrial development area.

According to the EPA's noise guidelines, outdoor noise levels of 55 dBA Ldn or less are considered protective of public health and welfare for residential land uses (EPA 1974). Because the nearest residential receptors are located approximately 4.5 miles from the Project site, modeled operational noise levels would attenuate well below this threshold before reaching those locations.

Therefore, operational noise generated by the Project would not substantially increase noise levels at nearby receptors and would be consistent with the existing industrial noise environment. Impacts from operational noise would be minimal.

3.10.4 Mitigation and Resource Protection Measures

The Project incorporates design features that minimize noise generation and propagation, including the use of enclosed generator units and equipment layout within the generation yard. In addition, existing separation distance between the Project site and off-site receptors further reduces potential noise exposure. Because noise generated by the Project would not result in substantial increases in ambient noise levels at sensitive receptors, impacts from Project noise would be less than significant. Therefore, no mitigation measures or additional resource protection measures are proposed.

3.11 Waste Management and Hazardous Materials

3.11.1 Existing Setting

Hazardous materials are substances that could endanger public and/or environmental health if released into the environment. Examples of hazardous materials include fuels and lubricants. Non-hazardous waste is discarded materials that would not endanger public and/or environmental health if released into the environment and typically includes common items, such as food packaging and construction debris.

A Phase I Environmental Site Assessment was conducted by UES on July 18, 2024 (UES 2024b). As part of the assessment, past and present conditions of the site were reviewed to ascertain whether there had been any history of contamination by hazardous materials. The assessment uncovered no evidence of recognized environmental conditions, controlled recognized environmental conditions, historical recognized environmental conditions, or vapor encroachment conditions. No evidence of hazardous materials, petroleum products, or waste generation, storage, or disposal was found onsite (UES 2024b).

One business environmental risk was identified by the Phase I Environmental Site Assessment. The Project site encompasses the site of the San Juan mine, a historical gold exploration Project (UES 2024b). Because of this, mine waste rock and/or tailings associated with the mine are located onsite. Soil samples were collected from tailings and waste rock piles and were tested for total metals. The test results indicated that total metal concentrations were below EPA Regional Screening Levels and consistent with regional background levels. As such, they do not represent a reportable release and the surficial soils are unlikely to pose a risk to human health. NDEP reviewed the results and concurred with these conclusions, adding that if development occurs in the mine area, then grading and capping of tailings and waste piles is recommended to promote vegetation growth and reduce potential for migration and leaching of metals. Additionally, undocumented mining features that could present physical hazards could be located onsite. Caution should be taken in the mine area to avoid unexpected encounters with such features and Nevada Division of Minerals and NDEP should be notified if any such features are found so that they can be properly closed and sealed (UES 2024b).

3.11.2 Environmental Consequences

Non-Hazardous Waste

During both construction and operation of the Project, the primary waste generated is expected to be non-hazardous solid waste, including paper, wood, glass, plastic, and metal waste. Non-hazardous solid waste could also include rags, machine parts, electrical materials, and empty containers. There could also be some liquid non-hazardous waste, such as lubricants, beverages, or cleaning water.

Non-hazardous waste, if not contained and properly disposed of, could cause local impacts, such as injury, entrapment, or mortality of wildlife; degradation, of vegetation communities and

habitat; and injury or exposure to humans traversing the area. Soils and water sources have the potential to become contaminated and cause harm to plants and wildlife. To reduce these impacts, non-hazardous waste products would be contained within appropriate storage containers and would be recycled or disposed of at the appropriate facilities according to local regulations. With the implementation of BMPs and mitigation measures, impacts would be avoided or minimized.

Hazardous Waste

Hazardous waste generated during construction would include liquid solvents. There would also be some solid hazardous waste, such as welding materials and dried paint. During operation, the hazardous materials used are expected to be limited in quantity and would include both liquid and solid waste products. The hazardous materials that are expected to be used during operation of the Project include oils, fuels, solvents, mineral insulating oil, and other chemicals used for various purposes; the complete list is available in Section **Error! R eference source not found.**.

Potential impacts include contaminated soil because of spills associated with construction activities. To prevent and reduce the potential impacts that could be caused by the release of hazardous waste products, BMPs, plans, and mitigation measures will be implemented. The site will eventually have over 500,000 gallons of oil containing materials onsite and will be required to have a SPCC, and along with the SWPPP will be developed to manage the discharge of pollutants from construction activities and provide procedures used to prevent spills. Spills that meet the criteria listed under NAC 445A.347 must be reported to NDEP within one working day.

Measures to reduce potential impacts include proper containment of hazardous materials according to local regulations, prohibiting the burning of any materials onsite, and maintaining spill cleanup kits on hand in the locations where hazardous materials are handled. Hazardous waste will be disposed of as required by Resource Conservation and Recovery Act (RCRA) regulations and will be managed onsite as required. Additionally, equipment and spill containment facilities will be inspected monthly to confirm they are in good working condition and to catch potential leaks as soon as possible.

A Hazardous Materials Inventory Reporting Permit will be prepared in accordance with NAC 477.323 and the International Fire Code, 2018 Edition (NAC 477.281) and submitted to the Nevada Department of Public Safety and the State Fire Marshal's Division per NRS 459.744 and NAC 459.9918. The power generation facility will be operated in compliance with all applicable federal, State, and local regulations. With the implementation of waste management plans, measures, and permits, the Project would not cause significant environmental impacts resulting from hazardous materials.

3.11.3 Mitigation and Other Resource Protection Measures

The following BMPs and mitigation measures will be implemented to prevent and reduce potential impacts associated with hazardous materials and non-hazardous waste. Unless otherwise specified, measures apply to construction and operation of the Project.

- Construction sites, staging and laydown areas, and access roads will be kept clear of debris and waste.
- Refuse and trash will be appropriately contained and removed from the Project site and disposed of in accordance with local regulations.
- Construction debris, including temporary stakes and flags, will be appropriately contained and removed from the Project site once they are no longer in use and stored or disposed of in compliance with local regulations.
- Oil or fuel from vehicles and construction equipment will not be drained onto the ground but rather into appropriate containment devices and disposed of according to regulations.
- Oils or chemical waste products will be contained and disposed of in accordance with regulations.
- Spill cleanup kits will be located at all oil, solvent, and/or waste storage areas per RCRA requirements so that fluid spills or leaks can be contained, cleaned, and properly disposed of as soon as possible. Within facilities, spill cleanup kits will be located near all locations where hazardous liquids will be handled such that access to the kit is quick and easy to facilitate immediate containment and cleanup of spills.
- Wastewater will be collected in self-contained systems that will be pumped and disposed of in accordance with local requirements.
- Waste will not be burned onsite.
- The Project will prepare and implement a SWPPP that will include BMPs to prevent contamination of waters by hazardous materials.
- Equipment and spill containment facilities will be inspected on a monthly bases, per EPA requirements.

3.12 Socioeconomics

3.12.1 Existing Setting

Demographics

The Project site is located within Storey County, Nevada and approximately 27 miles east of the Reno-Sparks metropolitan area. Based on a review of satellite imagery, the nearest sensitive receptors are residences in Stagecoach, Nevada, approximately 4.5 miles south of the Project site. The population of Storey County was estimated at approximately 4,139 people in 2023, a 3.1 percent increase since 2020 (Headwaters Economics 2025). Of the total population in 2023, the racial category with the highest estimated percent of the population was white alone (87.7

percent), followed by two or more races (8.9 percent), African American alone (1.9 percent), and Asian alone (1.0 percent) (Headwaters Economics 2025). Environmental justice populations are defined by the EPA as a community that has a higher proportion of minority or low-income populations than an identified reference community. Storey County has a higher proportion of white, non-Hispanic residents and lower proportion of low-income residents when compared to those in Nevada.

Income

In 2023, the average income was estimated at $50,554 and the median household income was estimated at approximately $96,000. The income bracket most prevalent in 2023 was $100,000 to $149,000, accounting for 23.5 percent of households. Labor earnings accounted for most of the household income (61.6 percent) followed by public assistance in the form of Social Security (59 percent). The U.S. Census Bureau uses a set of income thresholds that vary by family size and composition to detect who is poor. If the total income for a family or an unrelated individual falls below the relevant poverty threshold, then the family or individuals is classified as "below the poverty level". The number of families and individuals living below the poverty line in Storey County is estimated to be 20 families (1.9 percent) and 292 individuals (7.1 percent) (Headwaters Economics 2025).

Employment

The primary industries in Storey County are education, health care, and social assistance and manufacturing, which account for 19.4 percent and 17.9 percent, respectively, of the total workforce. Other industries include management, professional, administrative, and waste management (12.2 percent), retail trade (10.4 percent), and construction (7.7 percent) (Headwaters Economics 2025). Of the total estimated workforce in 2023, 32.2 percent of people are estimated to have worked within their county of residence while 67.8 percent of people are estimated to have commuted and worked outside of their county of residence (Headwaters Economics 2025).

Housing

The total housing units available in Storey County in 2023 were estimated at 2,112 units. Of the 2,112 available units, 1,874 units were occupied (88.7 percent), and 238 units were vacant (11.3 percent). Approximately 60 percent of Storey County's housing units are single-family residential dwellings, with 28 percent being mobile and manufactured homes. The remaining residential dwellings are multi-family or single-family attached units. The median monthly mortgage cost in 2023 was $1,821 and the median gross rent was $1,007. Approximately 34.9 percent of owner-occupied households and approximately 44.9 percent of renter-occupied households spent greater than 30 percent of total household income on mortgage costs and rent, respectively (Headwaters Economics 2025).

3.12.2 Environmental Consequences

The Project is expected to create temporary employment during construction of up to 20 people over 6 to 8 months and approximately five permanent jobs for O&M activities. The temporary construction jobs and associated income would be the primary driver of positive economic

benefits to Storey County. It is anticipated that most temporary workers would reside in Washoe County and commute to the Project site, while a small portion of the workers may relocate to the area. Storey County has vacant housing units available to accommodate the relocation of some of these workers. Because most temporary workers are not expected to reside in Storey County, the population is not expected to increase significantly during the construction phase; therefore, the impact on population and temporary housing would be minimal.

The income generated from temporary and permanent employment would benefit the region by supporting local businesses. Workers would spend their earnings on various services and products including food, transportation, accommodations, retail stores, and medical services. The State of Nevada and Storey County would benefit from tax revenues associated with the property and from the construction and operation of the Project.

The nearest sensitive receptor is a residence located approximately four miles west of the Project site. The Project would not have long-term or adverse health or environmental impacts; therefore, the Project would not disproportionately impact environmental justice or poverty populations.

3.12.3 Mitigation

Potential impacts to socioeconomic conditions may be beneficial; therefore, no mitigation measures or other resource protection measures are proposed.

3.13 Fire Management

3.13.1 Overview

Wildfires are uncontrolled fires spreading through vegetative fuels. Wildfires in the arid west can cause devastating damage to human structures and entire ecosystems. Wildfires can also cause human deaths and the mortality of vegetation and wildlife.

Invasive plant species, especially annual grasses, can create greater fire risk in areas because of their highly flammable nature and their ability to quickly spread across an area, often causing large, dense infestations that restrict the ability of other, less flammable plants to grow in those areas. Fires in areas invaded by such plants can be larger and more destructive than fires in areas with native, more fire resistant vegetation.

Human activities in landscapes that are prone to fires can increase the risk of wildfire. This section analyzes the risk of wildfire associated with the Project.

3.13.2 Existing Setting

The Project site is located in northern Nevada in an area characterized by hot, dry summers and frequent strong winds. Fire risk in this area is high, especially during the summer after a dry winter (most precipitation in this region comes as snow during the winter). Wildfires can start

naturally in this area, usually by lightning strikes. Naturally-caused wildfires usually remain relatively small. Human-caused ignitions are also fairly common in this region and can often result in larger fires. Any fire can quickly become larger under high wind conditions, which are common in this region.

Vegetation in the ungraded parts of the Project site is dominated by low shrubs that are relatively resistant to fire. However, cheatgrass was observed growing throughout the Project site in low densities. Cheatgrass is an invasive, nonnative, annual grass that can quickly take over disturbed soils and is highly flammable. No dense infestations of cheatgrass are currently present in the Project site.

3.13.3 Environmental Consequences

Existing anthropogenic sources of fire risk occur in or near the Project site. Vehicles and equipment associated with the development of the broader data center contain combustible fuels. Personnel working in this area could discard ignition sources, such as cigarettes. Construction activities could produce sparks that could start a fire, such as welding. Existing facilities in the TRI Center north of the Project site contain combustible items, such as chemicals, fuels, and paper waste. Existing NV Energy transmission lines north and south of the Project site could also start a fire if a line were to break.

The environmental consequences of a wildfire breaking out because of the Project could be devastating and far-reaching. As described above, people could lose lives and property and whole landscapes could be destroyed, including the mortality of general vegetation and wildlife and special status species. The effects of a large and destructive fire could be long-term. Ecosystems could take decades to recover, and some would never recover to pre-fire conditions without human intervention.

Construction and operation of the Project could introduce new fire risks to the Project region. Construction activities that produce sparks could ignite a wildfire. Vehicles or equipment started within tall vegetation could ignite the vegetation. The Project would produce combustible material that could add to the fuel load in the area, such as paper and wood waste or rags used to clean up flammable liquids, like oils, fuels, or chemicals. The power generation facility would contain flammable materials, including fuels, oils, solvents, and chemicals. To reduce the fire risk, the following measures would be implemented: areas in which construction activities that could produce sparks, like welding, would be cleared of combustible material prior to the activity; vehicles and equipment would be parked outside of tall vegetation; and combustible materials would be contained away from ignition sources.

Construction and operation of the Project could also introduce or spread invasive weeds, such as cheatgrass, that could increase the risk of wildfire and the potential for more damaging fire within the Project site. Seeds of invasive plants could be carried on vehicles, equipment, or personnel clothing. To reduce the risk of causing larger infestations of invasive weeds, the Project would develop and implement BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds. Temporarily disturbed soils would be revegetated with native

plant species following construction to reduce the risk of invasive weeds becoming established and causing dense infestations.

Additional fire prevention and suppression measures that would be implemented by the Project to reduce fire risk include: developing and implementing a Fire Management and Response Plan that includes specific plans for brush or equipment fires; keeping fire suppression equipment in vehicles and facilities; training personnel and contractors in BMPs to prevent fires and the use of fire suppression equipment in the event a fire breaks out; prohibiting campfires onsite; restricting smoking to designated areas; and maintaining vegetation in a way that reduces fire risk from vegetation interaction with Project facilities. With the implementation of these measures and those stated above, the risk of Project-related wildfire would be reduced to an acceptable level.

3.13.4 Mitigation and Other Resource Protection Measures

The following BMPs will be implemented to reduce the risk of fire starting because of the Project. Unless otherwise specified, measures apply to construction and operation of the Project.

- A Fire Management and Response Plan will be developed and implemented that includes specific plans for brush or equipment fires.
- Fire suppression equipment will be kept in Project vehicles, equipment, and facilities, and Project personnel and contractors will be trained in the use of this equipment.
- Project personnel and contractors will be trained in fire risk reduction measures, including the importance of not discarding burning objects, such as cigarettes or matches, in a way that could ignite combustible material.
- Campfires will not be allowed onsite, and smoking will be restricted to designated areas away from combustible materials.
- Vehicles and equipment will be parked away from tall vegetation to eliminate the risk of igniting a fire when the vehicle or equipment is started.
- Welding sites will be cleared of combustible material if present to minimize fire risk.
- Combustible material produced by the Project, such as paper products or rags used to clean oils or fuels, will be appropriately contained away from ignition sources.
- BMPs to prevent the introduction and spread of invasive weeds, including those that increase fire risk, such as cheatgrass, will be developed and implemented. See additional detail in Section 3.5.4.
- Temporarily disturbed soils will be revegetated as soon as construction activities have ceased in that area. Revegetation will include replanting or seeding with native plants that are generally more fire resistant than invasive weeds. Revegetation with native plants would help to prevent invasive weeds from invading and causing dense infestations. Revegetation success will be monitored and reported to the PUCN as described in more detail in Section 3.5.4.

- Vegetation around the Project facilities will be maintained to prevent or minimize the risk of fire resulting from contact with the Project facilities.

4 List of Preparers and Reviewers

A list of preparers and reviewers is provided in Table 10.

Table 10 List of Preparers and Reviewers

Name	Organization	Title
Jeff Tarde	Tract	Director, Energy Environmental
Dennis Bartlett	Tract	VP, Utility Development
Jeevitha Aruchamy	Fleet	Director, Planning and Delivery
Tania Treis	Panorama Environmental	Project Director/QA/QC
Colleen Lavery	Panorama Environmental	Project Manager
Abby Matanis	Panorama Environmental	Deputy Project Manager, Environmental Specialist
Nicci Beedle	Panorama Environmental	Environmental Specialist
Teresa Campbell	Panorama Environmental	Senior Biologist

5 References

Aggreko. 2024. "Technical_Data_Noise Level J420E."

American Society of Safety Professionals. 2020. "Preventing Hearing Loss in Construction and Demolition." March 17. https://www.assp.org/news-and-articles/preventing-hearing-loss-in-construction-and-demolition.

BlueScape. 2026. *Air Dispersion Modeling Report SV Technology Center*. Storey County.

dbmap. 2026. *Noise Mapping Results*.

dePolo, Craig M. 2008. "Quaternary Faults in Nevada." NBMG Publications. https://pubs.nbmg.unr.edu/product-p/m167.htm.

EPA. 1974. *Information Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin*. https://nepis.epa.gov/Exe/ZyNET.exe/2000L3LN.TXT?ZyActionD=ZyDocument&Client=EPA&Index=Prior+to+1976&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C70thru75%5CTxt%5C00000001%5C2000L3LN.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL.

EPA. 2025. *Counties Designated "Nonattainment."* September 30.

FEMA. 2025. "FEMA Flood Map Service Center." October 23.

Headwaters Economics. 2025. *Headwaters Economic Profile - Storey County*.

NDOT. 2024. "Traffic Information Systems." Web Map. Traffic Records Information Application (TRINA). https://gis.dot.nv.gov/trina/?data_id=dataSource_6-18f0c1dd20d-layer-14%3A5615.

NDOT. 2025. "NDOT Functional System Map." June 3. https://ndot.maps.arcgis.com/apps/mapviewer/index.html?webmap=457a02b6c5954c54805437a2a5660ab9.

5 REFERENCES

NDWR. 2025. "Nevada Hydrology Data." October 31. https://webgis.water.nv.gov/Html5Viewer/Index.html?configBase=http://webgis.water.nv.gov/Geocortex/Essentials/REST/sites/Hydrology/viewers/NV_Hydrology/virtualdirectory/Resources/Config/Default.

Nevada Department of Wildlife (NDOW). 2022. *Nevada State Wildlife Action Plan*. Edited by Barnes, J., L. Davis, J. Kleiber, J. Newmark, L. Mack, and A. Hessenius. In Draft Review. Reno, NV.

NRCS. 2026. *Custom Soil Resource Report for Storey County Area, Nevada*.

Price, Jon. 2026. "Earthquakes in Nevada."

Storey County. 1999. "Official Zoning Ordinance of Storey County, Nevada - Title 17." July 1. https://tahoereno.com/wp-content/uploads/2020/10/9_TRI-Storey-County-Zoning-Ordinance-web.pdf.

Storey County. 2024a. *Official Master Plan Map of Storey County McCarran*. Storey County, December. https://storeycounty.org/DocumentCenter/View/21968/McCarran-MP-Map-1.

Storey County. 2024b. *Official Storey County Zoning Map*. January 16. https://www.storeycounty.org/DocumentCenter/View/22543/SC-Plate-11-x-17-signed.

Storey County. 2024c. "Storey County Master Plan." https://storeycounty.org/292/Master-Plan.

UES. 2024a. *Biological Resources Assessment: South Valley Utility Infrastructure Project, Storey County, NV*.

UES. 2024b. *Phase I Environmental Site Assessment: South Valley, Storey County, Nevada*.

UES. 2025. "Tract South Valley Utility Infrastructure Phase I Project Environmental Statement." January.

U.S. Department of Agriculture (USDA). 2025. "LANDFIRE: Vegetation." October 24. https://landfire.gov/vegetation.

U.S. Fish & Wildlife Service. 2026. "National Wetlands Inventory." https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/.

U.S. Fish and Wildlife Service (USFWS). 2026. "IPaC Resource List." February 19.

U.S. Geological Survey. 2026. "National Hydrography Dataset." January. https://www.usgs.gov/national-hydrography/national-hydrography-dataset.

5 REFERENCES

Western Regional Climate Center. 2025. "FERNLEY, NEVADA - Climate Summary." October 24.

Westex. 2025. *Supplementary Geotechnical Investigation Mackay Substation*. Storey County, Nevada.

Exhibit G

PUBLIC UTILITIES COMMISSION OF NEVADA
DRAFT NOTICE
(Applications, Tariff Filings, Complaints, and Petitions)

Pursuant to Nevada Administrative Code ("NAC") 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include **ONE COPY** of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.160(5)(a)):

Application of SV RNO Property Owner 1 LLC for a Permit to Construct a temporary 144 MW natural gas power generation facility (the "South Valley Generation Facility") under the Utility Environmental Protection Act.

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(5)(b)):

SV RNO Property Owner 1 LLC

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled **AND** the effect of the relief or proceeding upon consumers (see NAC 703.160(5)(c)):

SV RNO Property Owner 1 LLC respectfully requests that the Commission issue an order approving this Application to construct a temporary 144 MW natural gas power generation facility, the South Valley Generation Facility, located on privately owned industrial land within the Tahoe Reno Industrial Center in Storey County, Nevada. The facility will consist of ninety (90) Jenbacher J420 natural gas-fueled engines (approximately 1.6 MW each), four (4) Volvo Penta Model TWD1683GE Tier 4 diesel black start engine gensets, forty (40) LNG holding tanks, two (2) dual-burner LNG vaporizers, and all necessary appurtenances and devices. The facility is designed to provide temporary behind-the-meter electrical power for a data center campus while NV Energy installs permanent utility infrastructure to serve the site. The facility is expected to operate for approximately two to three years. These facilities will be constructed on privately owned industrial land and will not affect rates or service to existing NV Energy customers.

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute ("NRS") 704.069(1)[1]:

A consumer session is not required.

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[1] NRS 704.069 states in pertinent part:

1. Except as otherwise provided in subsections 9 and 11 of NRS 704.110, the Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110, inclusive, in which:

(a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale, an annual deferred energy accounting adjustment application pursuant to NRS 704.187 or an annual rate adjustment application; and

(b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed $50,000 or 10 percent of the applicant's annual gross operating revenue, whichever is less.

If the draft notice pertains to a tariff filing, please include the tariff number **AND** the section number(s) or schedule number(s) being revised.

This draft notice does not pertain to a tariff filing.

Exhibit H

Outlook

Thank you for placing your order with us.

From Reno Legals <legals@rgj.com>
Date Mon 4/6/2026 4:24 PM
To Dallas A. Harris [redacted]

THANK YOU for your ad submission!

This is your confirmation that your order has been submitted to publish in the Public Notice/Classified section of the paper. Below are the details of your transaction. Please save this confirmation for your records.

We appreciate you using our online self-service ads portal, available 24/7. Please continue to visit Reno Gazette-Journal's online Classifieds HERE to place your legal notices in the future.

Deadlines vary by publication, changes and/or cancellations may not be honored due to deadline restrictions.

Job Details

Order Number: LNVS0494902
Classification: Public Notices
Package: General Package
Additional Options: 1 Affidavit [redacted]
Base amount: [redacted]
Service fee: [redacted]
Cash/Check/ACH
Discount: -$0.00
Total payment: [redacted]

As an incentive for customers, we provide a discount off the total order cost equal to the 3.99% service fee if you pay with Cash/Check/ACH. Pay by Cash/Check/ACH and save! In no event are service fees refundable.

Payment Type: mastercard

Account Details

Dallas Harris
[redacted]
Davison Van Cleve
Credit Card - [redacted]

Schedule for ad number LNVS04949020

Wed Apr 8, 2026
Reno Gazette-Journal *All Zones*

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA NOTICE OF APPLICATION

SV RNO Property Owner 1, LLC ("SV RNO") intends to submit an application for a permit to construct, operate and maintain the South Valley Temporary Power Generation Facility, a 144-megawatt capable temporary natural gas power generation facility located in Storey County, Nevada. This request for a permit to construct will be filed with the Public Utilities Commission of Nevada ("Commission") pursuant to the Utility Environmental Protection Act ("UEPA") set forth in Nevada Revised Statutes ("NRS") NRS §§ 704.820 to 704.900 and Nevada Administrative Code 703.423 and 703.415.

Notice is hereby given to persons residing in the municipalities in which the utility facility to be constructed will be located.

SV RNO will request a permit to construct, operate and maintain the following utility facilities:

A temporary 144 MW capable natural gas power generation facility located on approximately 4 acres within the South Valley data center campus in Storey County, Nevada, within the Tahoe-Reno Industrial Center. The facility will consist of ninety (90) natural gas-fueled engines, four (4) diesel black start engine gensets, forty (40) LNG holding tanks, two (2) LNG vaporizers, fifty-three (53) medium voltage transformers, and ninety (90) selective catalytic reduction systems. The facility will supply electrical power exclusively for on-site consumption at the South Valley data center campus.

The contents of the UEPA Application will include, among other things:

a) A description of the proposed facilities requiring a permit to construct from the Commission and its location, including a description of any associated equipment and diagrams of the location and layout of the proposed utility facility;

b) An environmental statement that describes the environmental characteristics of the project area, the potential environmental impacts from the construction and specific mitigation measures to be implemented to reduce those impacts;

c) A list of federal, state, regional and local agencies whose approval may be required for the proposed utility facility; and

d) An explanation of the extent to which the proposed utility facility is needed to ensure reliable service to electric customers within this state.

e) A description of any reasonable alternate location(s) for the Proposed Project, a description of the comparative merits or detriments of each location submitted, and a statement of the reasons why the primary proposed location is best suited for the facility.

f) Proof that a copy of the notice has been submitted to the Nevada State Clearinghouse within the State Department of Conservation and Natural Resources.

g) Proof that a public notice of the application was given to the persons residing in the municipalities entitled to receive notice by the publication of a summary of the application in newspapers published and distributed in the area in which the utility facility is proposed to be located.

The UEPA application will be filed under and governed by the provisions of the UEPA. Protests and written comments about the granting of the UEPA application must be filed with the Commission as provided by law.

SV RNO Property Owner 1, LLC

Publication Dates

LNVS0494902

Exhibit I

CERTIFICATE OF SERVICE

It is hereby certified that on April 20, 2026, a true and correct copy of the attached Application of SV RNO Property Owner 1 LLC for a Permit to Construct the Proposed South Valley Temporary Power Generation Facility in Storey County, Nevada, Under the Utility Environmental Protection Act was served via electronic mail on the following:

Staff Counsel Support
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, Nevada 89701-3109
pucn.sc@pucn.nv.gov

Public Utilities Commission of Nevada
Mr. Don Lomoljo, Staff Counsel
1150 E. William Street
Carson City, Nevada 89701-3109
dlomoljo@puc.nv.gov

Nevada State Clearinghouse
901 South Stewart Street, Suite 5003
Carson City, NV 89701-5246
nevadaclearinghouse@lands.nv.gov

Nevada Division of Environmental Protection
Ms. Jennifer Carr, Administrator
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701-5249
jcarr@ndep.nv.gov

Office of the Attorney General Bureau of Consumer Protection
Mr. Ernest Figueroa
100 North Carson Street
Carson City, Nevada 89701
bcp@ag.nv.gov

Storey County Clerk
Jim Hindle
26 S. B St, Drawer D
Virginia City, NV 89440
clerk@storeycounty.org

Dated: April 20, 2026

/s/Dallas Harris
Dallas Harris
Of Counsel
Davison Van Cleve, PC