Attachment 2

AES Response to the Third-Party Review of the Environmental Impact Report for the Rancho Viejo Solar Project in Santa Fe County, New Mexico, SWCA Environmental Consultants, January 2025

RESPONSE TO THE THIRD-PARTY REVIEW OF THE ENVIRONMENTAL IMPACT REPORT FOR THE RANCHO VIEJO SOLAR PROJECT IN SANTA FE COUNTY, NEW MEXICO, BY GLORIETA GEOSCIENCE, A DIVISION OF GZA GEOENVIRONMENTAL, INC.

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INTRODUCTION

Glorieta Geoscience (GGI), A Division of GZA GeoEnvironmental, Inc., was retained by Santa Fe County (County) to conduct a third-party review (Review) of an environmental impact report (EIR) submitted by Rancho Viejo Solar, LLC (Rancho Viejo), for technical accuracy and for compliance with the County Sustainable Land Development Code (SLDC) Chapter 6.3: EIR. GGI's Review included a technical accuracy assessment of the EIR followed by an in-depth review of the EIR's compliance with Chapter 6.3 of the SLDC in table format. The sections below include responses and additional information provided by the applicant, Rancho Viejo, to address GGI's assessments.

TECHNICAL ACCURACY ASSESSMENT

Below are items within the EIR that GGI identified as deficient, in need of clarification, and/or inaccurate. These items are in addition to GGI's evaluation of compliance with Chapter 3 of the SLDC and are not addressed in Table 1. The response to each item is followed directly after each comment.

1. **Water Use: Section 2.1.2.4 of EIR**

GGI Comment: The EIR states the estimated water use throughout the 12-month construction period will be 100-150 acre-feet. The provided water sources are as follows: "Santa Fe County bulk water station commercial pipe water; Ranchland Utility Company Class A reclaimed water; Santa Fe County reclaimed water; or any other legally permitted commercial water sales" (SWCA 2024a) and are proposed to be delivered by water truck only. The development also proposes to have one 30,000-gallon water tank on site throughout the duration of the Project's operational life.

It is GGI's opinion that more information is necessary to evaluate the potential impacts of water hauling for the project. 100-150 acre-feet is equivalent to 32.6-48.9 million gallons (MG) of water. The report states that working construction hours will be from 7AM to 7PM, meaning that water hauling would occur each day during this 12-hour window. Although not specified in the EIR, if 4,000 gallon water trucks are utilized, and 10,400-15,600 gallons are required each hour, the construction will require between 2-4 water trucks each hour. This magnitude of water hauling requires a much more in-depth analysis of traffic and air quality impacts resulting from the water truck traffic.

During GGI's Project site investigation on November 15, 2024, a fire hydrant was identified at the intersection of the access road and NM Highway 14. If this hydrant is expected to be the sole source of water for Project construction, additional analysis of the impacts of water hauling will not be necessary, and this method should be clearly described in the EIR. It is GGI's opinion that utilizing the fire hydrant would have much less impact on the local environment than the magnitude of water hauling as currently proposed.

In addition, the EIR does not address a water budget for the entire decommissioning process. The EIR should address the expected amount of water needed for the decommissioning process, potential impacts of this water use on the environment, and mitigation measures to be taken during the decommissioning process.

Applicant Response: Water use during construction will be approximately 100 to 150 acre-feet over a 12-month construction period and will be delivered to the Rancho Viejo Solar Project (project) site by water trucks and piped from the existing hydrant located at the intersection of the access road and State Road 14. The water will be leased from Univest-Rancho Viejo, LLC with water rights Univest-Rancho Viejo, LLC owns in the County water system that are not currently being utilized. Water use during

construction will maintain a balance between trucking reclaimed water to the project site and piping hydrant water and/or reclaimed water, to minimize transportation-related impacts and use of hydrant water. Water use will be managed as follows:

- During the months of April through September, when Ranchland Utility Company supplies much of its Class A reclaimed water for irrigation purposes, the majority of project construction water will be piped from the existing hydrant located at the intersection of the access road and State Road 14. This will limit the need for trucking water to the site from April through September. However, there may be several supplemental deliveries of reclaimed water (no more than six per day), when available, during these months. All water trucks will be scheduled outside the peak traffic hours of 7:30 to 8:30 a.m. and 4:30 to 5:30 p.m.
- During the months of October through March, when Ranchland Utility Company has excess Class A reclaimed water available, the majority of project construction water will be trucked to the site. This will allow for the greater use of reclaimed water from October through March. During these months, water truck deliveries will be limited to two water trucks per hour. Remaining construction water will be piped from the existing hydrant located at the intersection of the access road and State Road 14. All water trucks will be scheduled outside the peak traffic hours of 7:30 to 8:30 a.m. and 4:30 to 5:30 p.m. The project also may stage water storage tanks (e.g., frac tanks) on-site to minimize further the need for water trucks during periods of heavy use on State Road 14.

Under a worst-case scenario, there could be up to two water trucks per hour for a total of 20 water trucks per day from October through March and up to six water trucks per day from April through September. The EIR included 10 trips per day for material and equipment over the construction period and between 115 and 190 trips per day for workers commuting to the project for the duration of construction. The addition of six to 20 water trucks per day represents a 3% to 10% increase in vehicle trips. Because this addition of vehicle trips is modest, and because all water trucks will be scheduled outside the peak traffic hours of 7:30 to 8:30 a.m. and 4:30 to 5:30 p.m., there is no change to the traffic and roads effects analysis conclusions in the EIR. See enclosed confirmation letter prepared by Carl Vermillion, Traffic & Transportation Engineer at Bohannan Huston, and author of the Traffic Assessment for the project.

The addition of six to 20 daily water truck trips would increase total vehicle trips beyond the previously estimated 10 material and equipment trips and 115 to 190 worker commuting trips per day. These additional trips would result in a short-term increase in GHG emissions. However, by providing a new source of renewable energy, over its operational life, the proposed Project will reduce GHG emissions generated by the burning of fossil fuels, and thus, will be consistent with the objectives in Santa Fe County's GHG Emissions Reduction Plan.

With respect to the water budget for the entire decommissioning process, Rancho Viejo will comply with Condition #15, which states:

> *The Applicant shall provide a detailed and accurate water budget for construction, operation and maintained, and decommissioning. The water budget shall include water source and water trucking, and the water budget shall be reviewed by Glorieta Geoscience and approved by Santa Fe County Utilities.*

2. Hazardous Wastes and Spill Prevention Protocol: EIR Section 3.6.3

GGI Comment: The EIR describes spill prevention measures that will be taken by construction staff to mitigate construction impacts related to hazardous wastes. The EIR states that "the quantities and concentrations of these hazardous substances are not expected to reach regulated levels" (SWCA 2024a,

Section 2.1.2.6). It is GGI's opinion that an explanation should be added to this statement confirming that should hazardous wastes generated reach regulatory levels, Rancho Viejo Solar, LLC will acquire the necessary permits to comply with state and federal hazardous waste regulations.

Applicant Response: Rancho Viejo will acquire all necessary permits to comply with local, state, and federal hazardous waste regulations. Rancho Viejo will also comply with Condition #11, which states:

> *Applicant shall obtain an approved liquid waste permit from NMED prior to submittal for a Development Permit.*

3. Visual Resources: EIR Section 3.15

GGI Comment: The visual analysis includes a 'viewshed analysis' which utilizes Geographic Information Systems (GIS) to model which surrounding areas are visible when standing at a specific point. To analyze visual impacts to surrounding communities, the viewshed analysis was conducted using several 'viewshed analysis points' within the Project area boundary, assuming that someone was standing at each point and looking out across the landscape from a height of 6 feet. Figure 3.14. shows all areas that are visible from a combination of all 'viewshed analysis points' assuming a height of 6 feet above the ground.

It is GGI's opinion that this viewshed analysis methodology does not accurately represent post-construction conditions. The viewshed analysis should account for actual expected heights of constructed works in the facility (as follows): fence posts are expected to be no taller than 8 feet in height, solar panels will reach a maximum height of 8 feet, and the generation tie-in line expected to be 50-70 feet in height. The viewshed analysis should modify the inputs to utilize the different structure heights for each respective point in the Project area. For example, the viewshed analysis should be conducted so that the viewshed analysis points along the generation tie-in corridor are assumed to be 50-70 feet in height, as opposed to 6 feet in height. This will more clearly represent where construction will be visible to surrounding communities and major arterial roadways.

It is worth noting that the simulation analysis conducted and represented in the Rancho Viejo Solar Project Visual Impact Assessment Technical Report (SWCA, 2024b) does provide a thorough analysis of visual impacts as seen from 9 'key observation points'. These points accurately represent visual impacts to the most-impacted neighboring communities, and from State Highway 14. It is GGI's opinion that the Rancho Viejo Solar Project Visual Impact Assessment Technical Report (SWCA, 2024b), should be referenced in or appended to the EIR to fulfill technical accuracy.

Applicant Response: Contrary to GGI's assessment, as described in Section 3.15.2.1 of the EIR, the viewshed analysis accounted for the maximum height of the photovoltaic arrays and fence posts (8 feet above ground level) and the maximum height of the generation tie line (gen-tie) structures, whether H-frame (50 feet) or monopole (70 feet) is selected. Also described in Section 3.15.1 of the EIR, and in further detail in the 2024 *Rancho Viejo Solar Project Visual Impact Assessment Technical Report* prepared by SWCA, the viewshed analysis was conducted assuming a typical viewer height of 6 feet. This represents the height of the viewer and not the height of the facility components.

4. Biological Assessment

GGI Comment: The EIR addresses the presence of adult burrowing owls in the prairie dog colony in the southwest corner of the project site. Construction activities will avoid this colony and burrowing owl habitat entirely. GGI observed additional prairie dog colonies that were not represented in the EIR during our site visit on November 15, 2024. However, it is GGI's opinion that the mitigation measures described in the EIR to reduce potential impacts to both prairie dogs and burrowing owl species are sufficient.

Applicant Response: Thank you for your comment.

5. Evaluation of Significant and Insignificant Impacts on the Environment

GGI Comment: The EIR evaluates the development's impacts on 17 different environmental resources: air, biological, cultural, historic, archaeological, religious, geological, paleontological, soil, geographic, health and safety, land use, minerals and mining, noise, socioeconomic, roads, water, and visual resources.

For each of these environmental resources, a series of mitigation measures were described which will be implemented to mitigate potential impacts on the environment during the construction, operation, and decommissioning of the development. The EIR describes impacts to all resources as "less than significant" if mitigation measures are implemented. It is GGI's opinion that if all mitigation measures are implemented correctly, and if the fire hydrant is used to supply water for construction, operation, and decommissioning of the development, impacts to each environmental resource will be less than significant.

Applicant Response: Thank you for your comment.

EIR COMPLIANCE WITH SLDC

GGI's detailed Review of the EIR's compliance with SLDC Chapter 6.3, followed by responses from the applicant, Rancho Viejo, are presented in Table 1 below.

Table 1. Comment-Response Matrix for GGI's Assessment of Rancho Viejo Solar EIR Compliance with SLDC Chapter 6.3

Code	Topic	EIR Location	Requirement Satisfied?	Explanation	Applicant Response
Summary					
6.3.3. Summary.	Does the EIR contain a summary of the proposed actions and their consequences?	ES-1	Yes	The EIR satisfies this requirement.	Noted
	Is the language of the summary as clear and simple as reasonably practical?	ES-1	Yes	The EIR satisfies this requirement.	Noted
6.3.3.1.	Does the summary identify each significant adverse effect and impact with proposed mitigation measures and alternatives that would reduce or avoid that effect or impact?	ES-1	Yes	The impacts summary sufficiently describes potential and expected impacts to each resource category. All impacts are defined as "less than significant" throughout the summary and Ch 3 of the report.	Noted
6.3.3.2.	Does the summary identify areas of potential controversy identified in the pre-application TAC meeting?	ES-1	Yes	The Executive Summary states that the TAC letter with these issues in Appendix A. There were no items of potential controversy listed in the TAC letter.	Noted
6.3.3.3.	Does the summary identify issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects?	ES-1	Yes	The summary does identify issues to be resolved. It mentions the "no action" alternative and discusses the actions that went into avoiding impacts to certain environmental resources. No significant effects are expected, according to the EIR.	Noted
Description of the Development, Local Environment and Baseline Conditions					
6.3.4. Project Description.	Does the description of the project contain the following information in a manner that does not supply extensive detail beyond that needed for evaluation and review of the environmental impact? :	1-1	See below	See 6.3.4.1 below	See 6.3.4.1 below
6.3.4.1.	Does the description of the project contain precise location and boundaries of the proposed development project, such location and boundaries shown on a detailed topographical map? Does the description of the project contain the location of the project on a regional map?	1-2, 1-3	No	The regional map appears to be on a topo base, but no elevations are shown/legible, and the contour lines are too difficult to see. A detailed topographic map is needed.	See Figure 1.2 (attached), which has been updated to include detailed topographic contour lines.
6.3.4.2.	Does the description of the project contain a statement of the objectives sought by the proposed development project? The statement of objectives should include the underlying purpose of the project.	1-1	Yes	The EIR satisfies this requirement.	Noted
6.3.4.3.	A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities.	Ch 2, Ch 3	Yes	Technical characteristics are described thoroughly in Ch 2. Environmental characteristics are described thoroughly in Ch 3. Economic characteristics are not specifically described in the EIR, but SLDC Table 6-1 states that Fiscal Impact Assessment is on an "as needed" basis for this project.	Noted
6.3.5. Environmental Setting	Does the EIR include a description of the physical environmental conditions in the vicinity of the project as they exist at the time the environmental analysis is commenced, from the County, area, community, regional, and state perspectives?	Ch 3	Yes	The EIR satisfies this requirement.	Noted
Environmental Effects					
6.3.6. Significant Environmental Effects	Does the EIR demonstrate that the significant environmental effects and impacts of the proposed project were adequately investigated and discussed?	Ch 3	Yes	Significance is defined in the EIR as follows: "An impact would be considered significant if there were a regional or population-level impact and/or the affected resource would not fully recover, even after the impacting agent is gone and remedial or mitigating action is taken." The EIR states that there will be no significant impacts to the environment based on the definition provided in the report.	Noted
	Does the EIR demonstrate the significant adverse effects or impacts of the project in the full environmental context?	Ch 3	Yes	The EIR states that no proposed impacts are expected to be significant. They use the full environmental context to show this.	Noted
	Has a geotechnical investigation and report been completed for the project?	Ch 3	Yes	The geotechnical report is included in Appendix D.	Noted

Code	Topic	EIR Location	Requirement Satisfied?	Explanation	Applicant Response
	Does the EIR identify and focus on the significant environmental effects of the proposed development project?	Ch 3	Yes	The EIR states that no effects are expected to be significant; however, other impacts considered "less than significant" are identified and focused on in the report.	Noted
	Are direct and indirect significant effects and impacts of the project on the environment clearly identified and described, giving due consideration to both the short term and long-term effects and impacts?	Ch 3	Yes	Significance has been defined once in the EIR. Direct and indirect impacts are described throughout the report, along with short- and long-term duration status.	Noted
	Does the discussion include relevant specifics of the area, the resources involved, physical changes and alterations to soil conditions, water, environmentally sensitive lands and ecological systems, changes induced in the human use of the land, health and safety problems caused by physical changes, and other aspects of the resource base such as historical, cultural and archaeological resources, scenic vistas?	Ch 3	Yes	The EIR satisfies this requirement.	Noted
6.3.7. Significant Environmental Effects Which Cannot be avoided	Does the EIR describe significant adverse effects and impacts, including those which can be mitigated but not reduced to a level of insignificance?	Ch 3	Yes	None of the environmental impacts were listed as "significant." All impacts were discussed in a manner that describes their ability to be mitigated.	Noted
	Where there are effects and impacts that cannot be alleviated without an alternative design, does the EIR describe their implications and the reasons why the development project is being proposed?	Ch 3	Yes	Discussions of locations that were avoided to prevent impacts to visual, archaeological, biological, and wetland resources were included in the EIR. The final design and mitigation measures are presented as not having significant impacts, so these are not discussed.	Noted
6.3.8. Significant Irreversible Environmental Changes	Does the EIR evaluate irretrievable commitments of resources?	Ch 3	Yes	The EIR states "no irretrievable commitments of resources are anticipated" for all resources evaluated. In many places throughout the EIR, it is stated after discussing that mitigation measures will make impacts "less than significant," which alone does not satisfy this requirement. When discussed in regard to the decommissioning process, the EIR satisfies the requirement that the decommissioned project will be restored to pre-development conditions, meaning that there will be no irretrievable commitments of resources after the decommissioning process is complete.	Noted
6.3.9. Other Adverse Effects.	Does the EIR discuss other characteristics of the project which may significantly affect the environment, either individually or cumulatively? The EIR shall discuss the characteristics of the project which may decrease the area's suitability for other uses, such as mixed use, industrial, residential, commercial, historical, cultural, archaeological, environmental, public and non-profit facilities, eco-tourism or scenic uses.	Ch 3	Yes	No elements of the development are expected to have significant impacts on the environment, as long as mitigation measures are successfully implemented. The EIR does not discuss decreasing the area's suitability for other uses, because the decommissioning process will return the project site to its pre-development state if done correctly. The decommissioning bond will ensure that the decommissioning process is carried out properly.	Noted
6.3.10. Mitigation Measures.					
6.3.10.1.	Does the EIR identify mitigation measures for each significant environmental effect identified in the EIR, such as the following? • inefficient and unnecessary consumption of water and energy; • degradation of environmentally sensitive lands; • sprawl; and noise, vibration, excessive lighting, odors or other impacts	Ch 3	Partially	The water resource plan for the first year (construction) fails to address the inefficiencies and impacts of traffic on the surrounding communities and the environment. Water trucking to satisfy water volume needs would require 10,400–15,600 gallons (2–4 4,000-gallon water trucks) each hour assuming 12-hour workdays and 261 working days per year. This will contribute significantly to traffic, noise, and will increase greenhouse gas emissions associated with the project. If the fire hydrant is used at the access road point on State Road 14, it will reduce the potential impacts associated with hauling.	See "Applicant Response" provided to the Technical Accuracy Assessment from GGI in the above document. Specifically, see Item 1, Water Use: Section 2.1.2.4 of the EIR.
6.3.10.2.	Where several measures are available to mitigate an effect or impact, does the EIR discuss each measure and the basis for selecting a particular measure identified?	Ch 3	Yes	All measures discussed are ones being proposed to mitigate impacts.	Noted
	Does the EIR identify the formulation of mitigation measures at the first discretionary approval? Under no circumstances shall the formulation of mitigation measures be deferred until the ministerial development process.	Ch 3	Yes	The EIR satisfies this requirement.	Noted

Code	Topic	EIR Location	Requirement Satisfied?	Explanation	Applicant Response
	Do recommended measures specify performance standards which would mitigate the significant effect of the project?	Ch 3	Yes	The EIR states that the stormwater pollution prevention plan will outline performance standards for two of the resources being mitigated.	Noted
	Do recommended measures specify which may be accomplished in more than one specified way?	Ch 3	Yes	All mitigation measures discussed are ones planned to be taken by the applicant during development and closure/post closure.	Noted
6.3.10.3.	Does the EIR discuss energy conservation measures, as well as other appropriate mitigation measures, when relevant?	Ch 3	Yes	The EIR satisfies this requirement.	Noted
6.3.10.4.	Does the EIR discuss the adverse effects and impacts of mitigation measure when the mitigation measure would cause one or more significant effects and impacts in addition to those that would be caused by the project as proposed?	Ch 3	Yes	No mitigation measures are presented in a way that would cause additional impact to the environment if properly implemented. If the mitigation measures are not expected to cause more significant impacts, they do not need to be discussed in this context.	Noted
6.3.10.5.	Are the mitigation measures described in the EIR fully enforceable through conditions or a voluntary development agreement?	Ch 3	Yes	The EIR satisfies this requirement.	Noted
6.3.10.6. Were all of the following considered and discussed in the draft EIR:	1. preservation in place is the preferred manner of mitigating impacts to historic, cultural or archaeological sites. Preservation in place maintains the relationship between artifacts and the historical, cultural, and archaeological context. Preservation shall also avoid conflict with religious or cultural values of Indian communities associated with the site;	Ch 3	Yes	This is satisfied by the description provided in the text and the four letters from the SHPO (state historic preservation officer). The cultural sites will be avoided completely for construction and left in place. No religious resources will be impacted.	Noted
	2. preservation in place may be accomplished by, but is not limited to, planning construction to avoid all historical, cultural or archaeological sites; and incorporation of sites within parks, green-space, or other open space;	Ch 3	Yes	The EIR satisfies this requirement.	Noted
	3. when data recovery through excavation is the only feasible mitigation, a data recovery plan which makes provision for adequately recovering the scientifically consequential information from and about the historical, cultural, or archaeological resource, shall be prepared and adopted prior to any excavation being undertaken. If an artifact must be removed during project excavation or testing, storage of such artifact, under proper supervision, may be an appropriate mitigation; and	Ch 3	Yes	Excavation is not necessary as the two cultural sites will be avoided by at least 100 feet from the construction zone. All other artifacts were determined ineligible.	Noted
	4. data recovery shall not be required for an historical, cultural or archaeological resource if the appropriate entity determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the draft EIR.	Ch 3	Yes	The EIR satisfies this requirement.	Noted
6.3.11. Consideration and Discussion of Alternatives to the Proposed Project					
6.3.11.1. Alternatives to the Proposed Project.	Does the EIR describe a range of reasonable alternatives to the project, or to the location, which would feasibly attain some of the basic objectives of the project but would avoid or substantially lessen the significant and adverse impacts or effects of the project?	Ch 2	Yes	The alternatives discussed are ones that would have a greater impact on the environment than the project as proposed. The project as proposed is the least significant alternative.	Noted
	Does the EIR evaluate the comparative merits of the alternatives, even if those alternatives would impede the attainment of the project objectives or would be more costly?	Ch 2	No	Merits of the proposed alternatives are not discussed, only the reasons why the alternatives were not chosen.	As stated in the EIR, alternative locations were considered within the larger parcel. Merits of these alternatives are provided as follows: • Partially siting the Project in Sections 5 and 6 would have allowed the solar arrays to shift to the north and away from the San Marcos subdivisions. This alternative was dismissed due to biological resources constraints along the southern branch of Bonanza Creek and the north-facing slopes. • Siting the Project in Section 7, which is generally flat, would have benefited the overall solar production and efficiency rate. This alternative was dismissed based on public feedback related to concerns of potential visual resources effects to residential areas located to the south.

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					• Locating the Project closer to State Road 14 would have provided for a shorter access road. This alternative was eliminated because it is within part of the Turquoise Trail National Scenic Byway.
6.3.11.2. Evaluation of alternatives.	Does the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project?	Ch 2	No	The only information provided about alternatives is reasons why they were not chosen.	See additional details added in the row immediately above, including merits of alternatives considered but eliminated from further analysis. Ultimately, the Proposed Action was chosen because it was the option that minimizes environmental impacts, and it represents the most feasible alternative for implementation.
6.3.11.3. Selection of a range of reasonable alternatives.	Does the EIR briefly describe the rationale for selecting the alternatives discussed?	Ch 2	No	No, the EIR does not explain why the alternatives were selected, but rather why the alternatives were not selected in place of the project as proposed.	The Proposed Action was refined based on public feedback, environmental diligence studies, and design constraints and this refined Proposed Action is the Project that is proposed within the CUP application and EIR. Ultimately, the Proposed Action was chosen because it was the option that minimizes environmental impacts, and it represents the most feasible alternative for implementation.
	Does the EIR also identify any alternatives that were considered but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the determination?	Ch 2	Yes	The EIR satisfies this requirement.	Noted
6.3.11.4. "No project" alternative	Was the specified alternative of "no project" evaluated along with its effects and impacts?	Ch 2, Ch 3	Yes	There is a brief description in Ch 2 of the "no project" alternative. In addition. There are sections labeled "No Action" under every single potentially impacted resource throughout Ch 3. Each of these together satisfies this requirement.	Noted
6.3.11.4	Does the description and analysis of a "no project" alternative allow a comparison of any adverse effects and impacts of the proposed project with effects and impacts if the project were not accomplished?	Ch 2, Ch 3	Yes	The EIR satisfies this requirement.	Noted
6.3.11.4	Is the "no project" alternative identical to the existing environmental setting analysis? If so, the "no project" alternative analysis is the baseline for determining whether the proposed project's environmental effects or impacts may be significant or adverse.	Ch 2	Yes	The "no project" alternative is presented as identical to the existing environmental setting in Section 2.2.	Noted
6.3.11.4.1	1. Does the "no project" analysis discuss the existing conditions at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the development project were not approved, based on current plans and consistent with available infrastructure and community services? Is the environmentally preferred alternative the "no project" alternative, and does the draft EIR also identify an environmentally preferred alternative among the other alternatives?	Ch 2	Yes	The EIR frames the Proposed Project as the environmentally preferred alternative – the "no action" focuses on the potential other types of future development being worse, and the other locations as more impactful to certain resources. SLDC states the following: "If the environmentally preferred alternative is the 'no project' alternative, the draft EIR shall also identify an environmentally preferred alternative among the other alternatives." The EIR does discuss what would be reasonably likely to occur in the foreseeable future.	Noted
	Does the discussion of the "no project" alternative proceed as follows: The "no project" alternative is the circumstance under which the development project does not proceed. Does the discussion compare the environmental effects of the property remaining in its existing state against the environmental and adverse effects which would occur if the project were to be approved? If the consequence of disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other development project, was this discussed? Does the "no project" alternative mean "no build", i.e., where the existing environmental setting is maintained? If failure to proceed with the project will not result in preservation of existing environmental conditions, does the analysis identify the practical result of the project's non-approval?	Ch 2, Ch 3	Yes	Discussions of the No Project alternative are described in Ch 2 as well as throughout Ch 3 as they relate to each potentially affected resource. These descriptions compare the impacts of no development to the impacts of other potential developments. Other potential types of development projects are described in Section 2.2. The consequences of the development are described as follows: "the No Action Alternative could result in impacts to resources that would be similar and potentially greater in magnitude than the Proposed Action. Further, as Santa Fe County and the state of New Mexico both have goals related to renewable energy production, this Project would not contribute to those goals under the No Action Alternative."	Noted
6.3.11.5. Feasibility	Were some or all the following considered when addressing the feasibility of alternatives: • site suitability, • economic use and value viability, • availability of infrastructure, • jurisdictional boundaries (projects with a significant effect or impact should consider the county wide context), and	Ch 2	Partially	Alternative locations for the generation tie line and battery energy storge system were not discussed in the EIR, but alternative locations for the solar array itself were discussed and avoided due to biological resources, potential impacts to the Turquoise Trail National Scenic Byway, cultural resources, visual resources, and jurisdictional wetland boundaries. Additional explanations relating to the feasibility of alternatives is necessary for the project beyond just alternative locations for parts of the development as discussed above.	The battery energy storage system was sited to be approximately 1.5 miles from residential properties. The project collector substation is sited adjacent to the battery energy storage system as a general design standard. The generation tie line alignment is a function of the shortest distance between the project collector substation and the point of interconnection. By minimizing the length of the generation tie line, the project minimizes potential impacts, including potential impacts to visual resources. The Proposed Action was refined based on public feedback, environmental diligence studies, and design constraints and this refined Proposed Action is the

Code	Topic	EIR Location	Requirement Satisfied?	Explanation	Applicant Response
	• whether the applicant can reasonably acquire, control or otherwise have access to an alternative site in the common ownership?				Project that is proposed within the CUP application and EIR. Ultimately, the Proposed Action was chosen because it was the option that minimizes environmental impacts, and it represents the most feasible alternative for implementation.
6.3.11.6. Alternative locations.	Does the analysis identify whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location? Only locations that would avoid or substantially lessen any of the significant effects of the project should be included in the EIR. Does the EIR consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (this is something that should NOT be done)?	Ch 2	Yes	The analysis does not identify any impacts of the development as "significant" but discusses that alternative locations of the proposed project would have impacted certain cultural, visual, biological, and other resources more than the project as proposed. The SLDC states that only locations which would avoid or substantially lessen any of the significant effects of the project should be included in the EIR; however, the EIR states no "significant" impacts will be associated with the development. The EIR does not consider alternatives that are not reasonably ascertainable and whose implementation is remote and speculative.	Noted
6.3.12. Organizations and Persons Consulted					
6.3.13. Discussion of Cumulative Impacts.	Does the EIR discuss cumulative effects of a project? Does the discussion of cumulative effects and impacts reflect the severity of the effects and impacts and their likelihood of occurrence?	Ch 3	Yes	Cumulative impacts are summarized for every resource (Ch 3) within the cumulative impact analysis area (5-mile radius around project). Likelihood of impact is described, and severity is described (the EIR describes all as insignificant).	Noted
6.3.13.1.	Does the discussion focus on the cumulative effects and impacts to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative effect and impact?	Ch 3	Yes	The EIR satisfies this requirement.	Noted
	Does the EIR discuss the following elements necessary to an adequate discussion of significant cumulative impacts: 1. a list of past, present, and probable future development projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the County (when determining whether to include a related development project, factors to consider should include, but are not limited to, the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue or when an impact is specialized, such as a particular air pollutant or mode of traffic);	Ch 3	Yes	The EIR satisfies this requirement.	Noted
	2. Does the EIR define the geographic scope of the area affected by the cumulative effect and impact and provide a reasonable explanation for the geographic scope utilized?	Ch 3	Yes	The geographic scope is defined as the cumulative impact analysis area, which includes a 5-mile buffer around the proposed project and a reasonable explanation is provided.	Noted
	3. Does the EIR include a summary of the expected environmental effects to be produced by those projects with the specific reference to additional information stating where that information is available?	Ch 2	Yes	The expected environmental effects associated with other projects in conjunction with this project are mentioned briefly in each "cumulative impacts" statement associated with each resource throughout Ch 3. Section 3.2 describes past, present, and probable future development projects citing sources for this information.	Noted
	4. A reasonable analysis of the cumulative impacts of the relevant projects? Does the draft EIR examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects or impacts?	Ch 3	Yes	The EIR and Rancho Viejo Solar, LLC, specify their proposed actions to mitigate the development's contribution to cumulative impacts on the environment.	Noted
6.3.13.2.	Did the cumulative impact analysis use approved land use documents, including the SGMP and any applicable area, district or community plans? Was a pertinent discussion of cumulative effects and impacts, contained in one or more previously certified final EIR development projects and incorporated by reference?	Ch 3	Partially	Ch 3.2 references the SGMP and the Community College District (Plan. The EIR does not reference one or more EIRs in the vicinity.	There are no applicable previously certified EIRs in the vicinity for consideration.

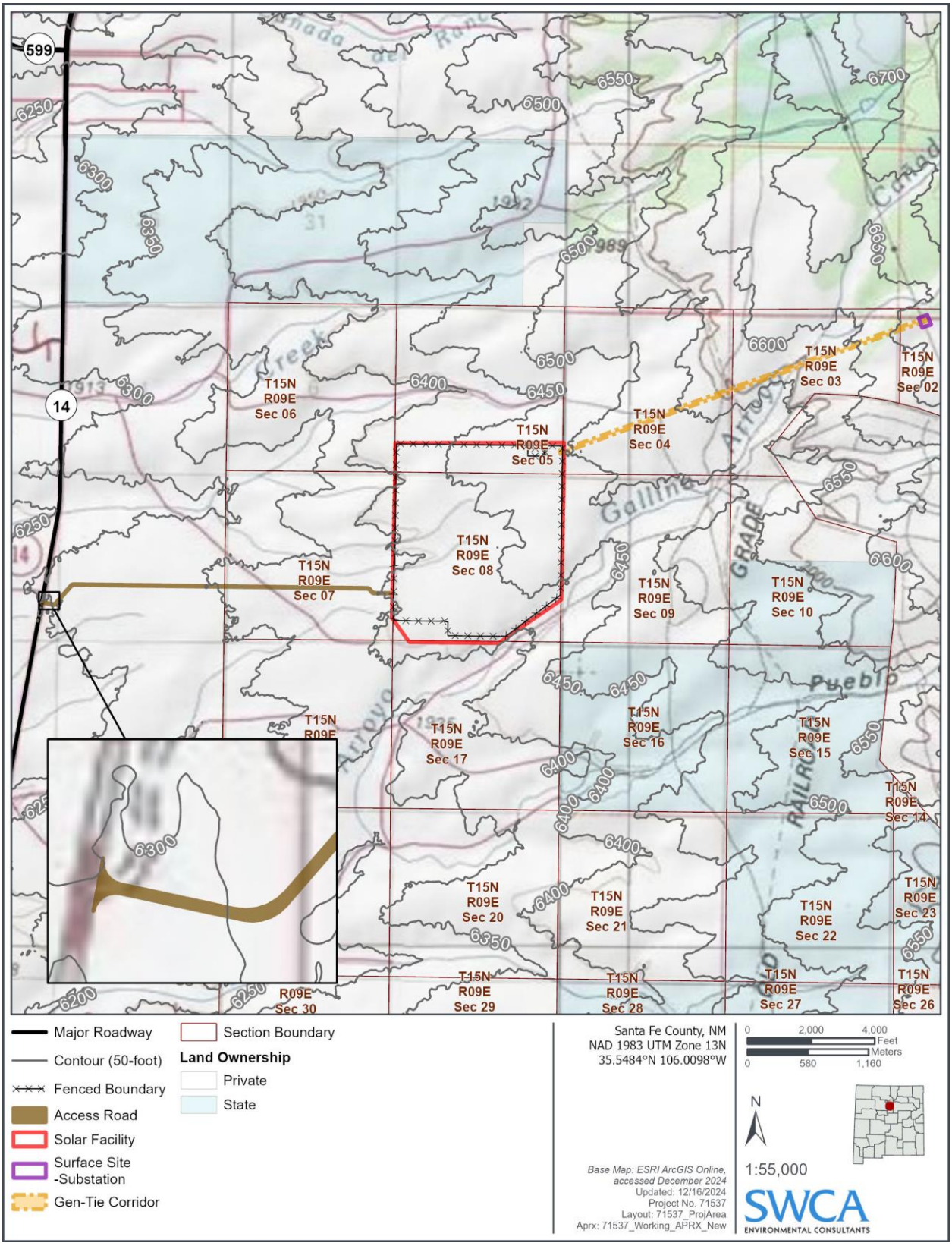

Figure 1.2. Project area.

Bohannan Huston
great people supporting great communities

7500 Jefferson Street NE
Albuquerque, NM 87109
505.823.1000
bhinc.com

M E M O R A N D U M

DATE: January 17, 2025

TO: Matt Gordon, Senior Project Manager AES Clean Energy

FROM: Carl Vermillion

SUBJECT: **AES Rancho Viejo Solar Development – Traffic Assessment Update**

Santa Fe County has released third party review comments for the environmental impact report which includes a worst-case assumption on how many water truck trips will be required for the site during construction.

Initially, the STA provided 10 heavy haul truck trips per day. In response to the third-party review, the number of water truck trips was estimated at two water trucks per hour for a total of 20 water truck trips per day from October through March and 6 water truck trips per day from April through September.

The STA provided an assessment on the peak hour trips which included 150 work trucks (ex: crew, foreman, superintendents) per day, and 40 work trucks specifically for the BESS install per day. Since the water truck trips will be spread out during the day and scheduled outside of the peak traffic hours of 7:30 to 8:30 AM and 4:30 to 5:30 PM, they will not impact the number of trips during the peak hour.

Under worst-case scenario, there could be up to two water truck trips per hour for a total of 20 water truck trips per day from October through March and up to six water truck trips per day from April through September. The EIT and STA included 10 trips per day for material and equipment over the construction period and a maximum of 190 trips per day for workers commuting to the project for the duration of construction. The addition of six to 20 water trucks per day represents a 3% to 10% increase in vehicles trips per day. Because this addition of vehicle trips is modest, and because all water trucks will be scheduled outside of the peak traffic hours of 7:30 to 8:30 AM and 4:30 to 5:30 PM, there is no change to the traffic and roads conclusions in the EIR and STA.

We kindly request formal concurrence that based on our updated traffic findings, the reviewers do not have any further concerns related to traffic. If you have any questions or concerns about this traffic letter, please feel free to contact me at cvermillion@bhinc.com or 505-823-1000 to discuss further.

Thank you for your consideration.

/jma

Enclosures: STH Memo, October 5, 2022

Site Threshold Analysis (STA)

According to NMAC 18.31.6.16, a traffic engineering evaluation shall be required for all land development proposals that may directly or indirectly impact a state highway facility. A Site Threshold Analysis (STA) is required of all developing or re-developing properties that directly or indirectly access a state roadway. The STA examines existing roadway volumes and anticipated site trip generation for the purpose of determining if additional analyses are required as defined by the District Traffic Engineer or designee. If the site characteristics and the trip generation estimate for a proposed development are greater than 100 trips in a peak hour, then requirements for a Traffic Impact Analysis (TIA) may be required as determined by the District Traffic Engineer or designee. See TIA outline for that scope.

The STA shall warrant one or all of the following conditions:

- May or may not warrant an additional traffic analysis.
- May or may not warrant off-site improvements.
- May require a TIA, which may or may not require off-site improvements.

If additional analysis is required based on the results of the STA, the District Traffic Engineer or designee, should indicate to the applicant the level of analysis that is required.

Permit Applicant Information

Applicant Name: Bohannan Huston Inc

Business Name: Rancho Viejo Solar

Business Address: 4173 NM 14 (Street Address:) Santa Fe (City:) NM (State:) 87508 (Zip Code:)

Site Information (Attach Site Plan to include length of roadway frontage):

Site Description: 96 MegaWatt Solar Farm on ~800 acres

Site Address: 4173 NM 14 (Street Address:) Santa Fe (City:) NM (State:) 87508 (Zip Code:)

NMDOT Roadway: NM 14 Milepost: 41.5 Roadway ADT: 5,841

Site Information (commercial, retail, industrial, residential, etc):

Development of 800 acres of land to contain 96 MegaWatt solar farm.

Minimal traffic to site after construction (See attached Memo)

Building Size (SF): 0 Parcel Size (acre): ~800

Trip Generation:

ITE Trip Generation Land Use Category: See Attached Memo for Trip Generation

AM Peak Hour Trips Enter: 4 Exit: 0

PM Peak Hour Trips Enter: 0 Exit: 4

Exceeds Threshold for TIA (100 or more peak hour total trips):

Yes ☐

No ☑

See Attached memo for additional details for STA and TIA determination

Bohannan Huston

Engineering
Spatial Data
Advanced Technologies

Courtyard I
7500 Jefferson St. NE
Albuquerque, NM
87109-4335

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voice: 505.823.1000
facsimile: 505.798.7988
toll free: 800.877.5332

MEMORANDUM

TO: Javier Martinez, PE, NMDOT District 5 Assistant District Engineer

FROM: Carl Vermillion

DATE: October 5, 2022

SUBJECT: **AES Rancho Viejo Solar Development – Traffic Assessment**

Bohannan Huston has prepared a site threshold assessment for a proposed 800-acre solar farm to be developed by the AES corporation. This memorandum includes an assessment of the vehicle trip generation anticipated during typical operations after the project is build and traffic during project construction along with discussion on access points onto NM 14.

Project Description

The proposed project is a new solar farm installation located in Santa Fe County east of NM 14 in the vicinity of the existing Turquoise Trail Charter school. Construction of the site will consist of a 96 Megawatt (MW) installation within an area of approximately 800 acres of land (see attached figure for location). This installation may incorporate a Battery energy storage system (BESS) on the property. The main assessment of traffic will result from the operational activities of the site after construction and the second traffic assessment will focus on traffic impacts related to the construction of the proposed facility including the BESS system.

Once operational, the site will be staffed with up to 4 permanent employees on-site to conduct operations and maintenance activities. As a result, the number of employee vehicle trips generated by the site during typical operations is considered negligible. The information provided will result in the following peak hour traffic generation distribution:

AM Peak Hour: Entering – 4 vehicles; Exiting – 0 vehicles
PM Peak Hour: Entering – 0 vehicles; Exiting – 4 vehicles

Based on the State Access Management Manual (SAMM) a TIA is required for developments that generate 100 or more peak hour total trips. As the worst case trip generation results in 4 vehicles per hour for either peak hour, a TIA for this development is not required.

However, the primary traffic concern for the proposed project is associated with the potential temporary construction traffic impacts. The construction of the site is anticipated to last approximately 12 months. Construction is anticipated to require an estimated 190 workers on-site per day. The personnel will be local workforce and they will be encouraged to carpool to the site each day. Construction staff will be on-site between 7 AM to 4 PM Monday through Friday.

Similar to the construction of solar facilities in other locations, the number of employees for the first 2 months and the last 2 months of construction will be lower with peak on-site employment occurring for the eight months in the middle of the project schedule. The traffic generation values incorporate both the solar farm and the BESS. This estimate is considered conservative for this site since the BESS system may or may not be constructed as part of the solar facility.

The number and type of vehicles planned to be involved during peak construction are described as follows:

- 10 heavy haul trucks (ex: 18 wheeler deliveries, water trucks, garbage trucks) per day
- 75 to 150 work trucks (ex: crew, foreman, superintendents) per day
- 40 work trucks specifically for the BESS install per day

As construction activities will be a much higher generator than the day-to-day activities of the site, the NMDOT may want to consider traffic impacts based on the traffic during the construction phase. It is anticipated that 190 work trucks will arrive between 6:30 and 7AM and will depart the site at 4PM. The 10 heavy trucks will arrive on the site outside of the anticipated peak hours. At the adjacent intersection of NM 14 and NM 599 the peak hours are 7:30 to 8:30AM and 4:30 to 5:30PM. It is anticipated that some of the traffic associated with this site may arrive during the peak hour but the majority will travel prior to the AM and PM peak hours.

With the information provided above, peak hour trips were generated. This will result in the following traffic generation distribution:

AM Peak Hour: Entering – 190 vehicles; Exiting – 0 vehicles
PM Peak Hour: Entering – 0 vehicles; Exiting – 190 vehicles

It is Bohannan Huston's professional opinion that this is a conservative approach to account for all trips during the peak hour associated with the construction activities for the development site.

Vehicle Access

An existing access point for the property has a gated entry on NM 14 1,300 feet to the north of the existing Turquoise Trail Charter School. This entry serves the development property today, but the development wants to improve and realign this access point to facilitate traffic for the construction of the solar farm. As part of this realignment, the access point will be moved to the north approximately 450 feet to align with the existing on site travel pattern. This new location will be located approximately 100 feet to the north of the existing driveway on the west side of NM 14. It is understood that this will require a new driveway permit with the NMDOT and this process will begin soon after this STH process is discussed and approved.

An analysis of the State Access Management Manual (SAMM) was done to determine if any criteria would be met based on requirements by the NMDOT. Criteria for deceleration lanes was validated with a design speed of 55 mph as is posted in the project area. Table 17.B-3 indicates that on a rural two-lane highway such as NM 14 in the project area, a left turn volume of 20 vehicles per hour requires a left turn deceleration lane.

The assessment for the operations of the site indicated a left turn deceleration lane is not warranted due to the small volume that will be traveling to the site. This assessment was also conducted for the site during construction, where a left turn deceleration lane is warranted due to the high volume of construction vehicles accessing the site. Since these traffic volumes will only be applicable during construction the project team believes that these deceleration lanes should not be implemented.

Assessment

Based on our initial traffic evaluation and STA, Bohannan Huston has determined that additional traffic impact studies are not warranted per the SAMM, as the site is expected to generate 4 peak hour total trips during operations. Alternatively, during construction the site is expected to generate 190 peak hour total trips. Based on the SAMM a TIA is required for developments that generate 100 or more peak hour total trips. As this is a temporary condition due to the construction activity at the site, we believe a TIA should not be required for this development.

Additionally, a driveway permit will be required to move the access point to the north by 350 feet. Should future development activities propagate additional traffic evaluations, these will be conducted to assess those project-specific needs and traffic generation.

We kindly request formal concurrence that based on our traffic findings, NMDOT does not have any concerns related to traffic and new driveway access off NM 14. Please feel free to contact me at cvermillion@bhinc.com ; 505-923-3318 to discuss. Thank you for your consideration.

/jma

Enclosures: Overall Map
Traffic Signal Counts – NM 14 and NM 599

LOT LINE ADJUSTMENT AND TDR SENDING AREA PLAT WITHIN AREA 2

T5N, R8E, NMPM,
AND
T5N, R9E, NMPM,

PREPARED FOR
RANCHO VIEJO LIMITED PARTNERSHIP
SANTA FE COUNTY, NEW MEXICO

AREAS 7 AND 8 ARE NOT PART OF THIS SURVEY, BUT ARE INCLUDED AS REFERENCE ONLY.

GRID

SCALE 1"=2400' FEET
2400 0 2400

AREA 9
AREA 8
NEW TRACT 1
379/019
AREA 7
NEW TRACT 3
379/019
SANTA FE COMMUNITY COLLEGE
STATE
AREA 4
AREA 6
SEE SHEET 6 OF 6
I-25
AREA 5
BECILIA ESTATES
ELDORADO DE SANTA FE
R8E
R9E
R10E
T16N
T15N
T14N
POWERLINE
COMMUNITY COLLEGE DISTRICT BOUNDARY (ADMINITSRATIVE LINE)
RUR-F AREA
536.17 Ac±
MIXED USE AREA
567.48 Ac±
RUR-F AREA
513.67 Ac±
SOLAR SITE (9-23-22)
1,088.83 Ac±
MIXED USE AREA
664.13 Ac±
MIXED AREA INCLUDES N. PORTION TRACT V
DRAFT
Proposed Solar Site Location
Location of NM 14 access point
SEE SHEET 3 OF 4
SEE SHEET 4 OF 4
REMAINDER AREA 2
6,187.87 Ac±
RANCHO SAN MARCOS SUBDIVISION
LOT 2, TRACT V
SR14
CORRALS
AREA 3
AREA 1
CANADA DE LOS ALAMOS GRANT

LEGEND:

BEARINGS ARE DERIVED FROM BOUNDARY SURVEY PREPARED FOR RANCHO VIEJO DE SANTA FE RECORDED IN PLAT Bk. 521, Pg. 44-50-A OFFICE OF THE SANTA FE COUNTY CLERK

- ◉ DENOTES BRASS CAP
- ●F DENOTES REBAR, OR AS SHOWN FOUND
- ● DENOTES REBAR, OR AS SHOWN TO BE SET UPON RECORDING
- ○ DENOTES CALCULATED POINT NOT SET
- NLL DENOTES NEW LOT LINE
- Ø DENOTES UTILITY POLE
- DENOTES OVERHEAD UTILITY LINE
- DENOTES FENCE
- DENOTES TDR SENDING AREA

THIS PLAT SUBJECT TO ALL VALID RESTRICTIONS, COVENANTS AND EASEMENTS OF RECORD

SYMBOLS MAY BE SHOWN LARGER THAN ACTUAL SIZE FOR VIEWING PURPOSES.

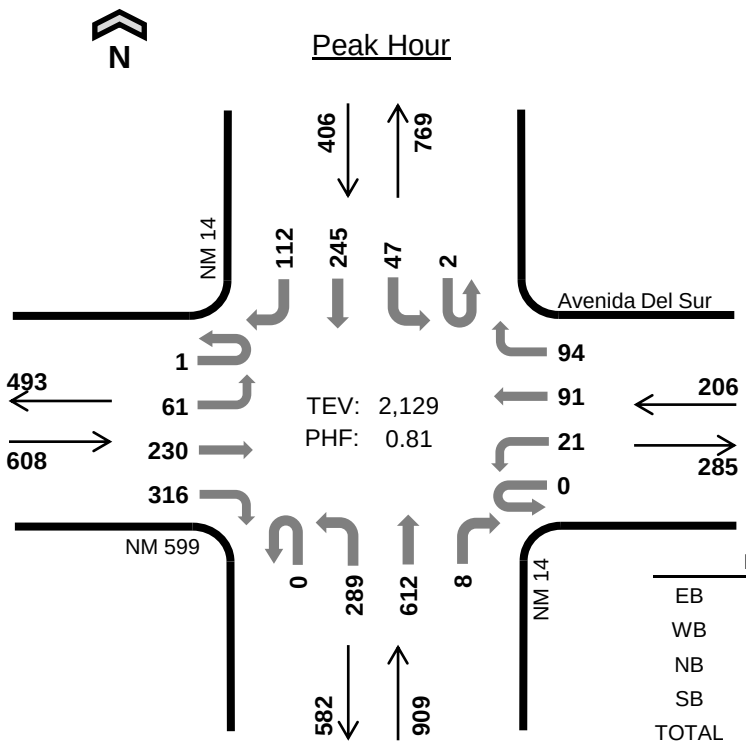
TABLE OF AREAS	
AREA 1	1083 Ac.
AREA 2	9331 Ac.
AREA 3	14 Ac.
AREA 4	8307 Ac.
AREA 5	30 Ac.
AREA 6	18 Ac.
AREA 7	3 Ac.
AREA 8	6 Ac.
AREA 9	26 Ac.
TOTAL	18818 Ac.

DRAFT

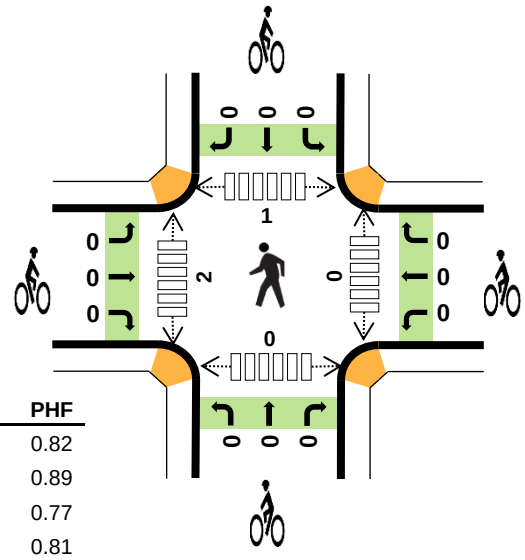
SHEET 2 of 4

DAWSON SURVEYS INC.
PROFESSIONAL LAND SURVEYORS
7505 MALLARD WAY, SUITE A
SANTA FE, N.M. 87507
FILE#10762\TDR DATE:09\26\2022

NM 14
NM 599



Date: 09/28/2022
Count Period: 6:00 AM to 9:00 AM
Peak Hour: 7:30 AM to 8:30 AM



	HV %:	PHF
EB	3.5%	0.82
WB	4.4%	0.89
NB	3.0%	0.77
SB	5.7%	0.81
TOTAL	3.8%	0.81

Three-Hour Count Summaries

Interval Start	NM 599 Eastbound				Avenida Del Sur Westbound				NM 14 Northbound				NM 14 Southbound				15-min Total	Rolling One Hour
	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT		
7:30 AM	0	9	65	111	0	7	25	26	0	86	169	0	0	8	70	25	601	0
7:45 AM	0	18	69	99	0	5	23	24	0	98	193	5	0	10	85	31	660	0
8:00 AM	0	13	56	68	0	4	24	26	0	60	133	3	0	17	52	27	483	0
8:15 AM	1	21	40	38	0	5	19	18	0	45	117	0	2	12	38	29	385	2,129
Peak Hour All	1	61	230	316	0	21	91	94	0	289	612	8	2	47	245	112	2,129	0
Peak Hour HV	0	3	7	11	0	1	6	2	0	14	12	1	0	2	4	17	80	0
Peak Hour HV%	0%	5%	3%	3%	-	5%	7%	2%	-	5%	2%	13%	0%	4%	2%	15%	4%	0

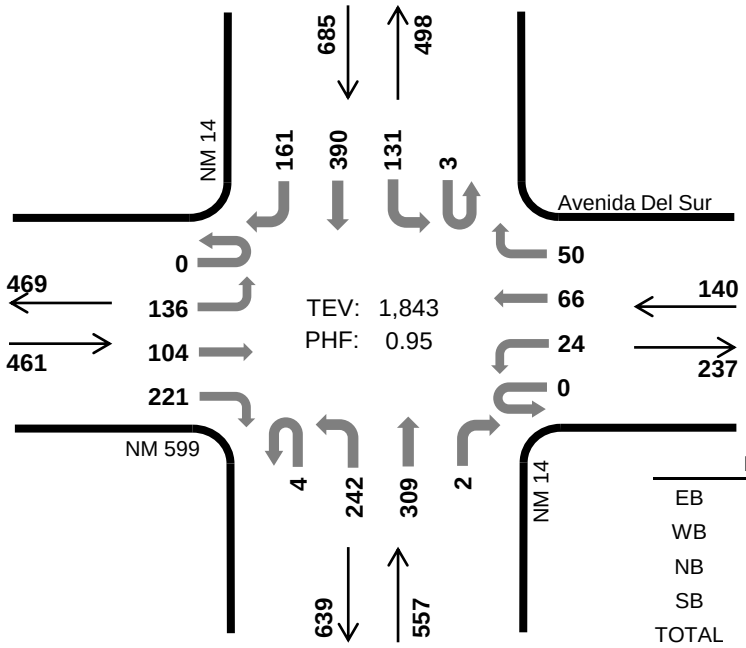
Note: For all three-hour count summary, see next page.

Interval Start	Heavy Vehicle Totals					Bicycles					Pedestrians (Crossing Leg)				
	EB	WB	NB	SB	Total	EB	WB	NB	SB	Total	East	West	North	South	Total
7:30 AM	8	5	5	10	*28*	0	0	0	0	*0*	0	0	0	0	*0*
7:45 AM	3	0	11	6	*20*	0	0	0	0	*0*	0	2	1	0	*3*
8:00 AM	5	3	7	2	*17*	0	0	0	0	*0*	0	0	0	0	*0*
8:15 AM	5	1	4	5	*15*	0	0	0	0	*0*	0	0	0	0	*0*
Peak Hour	21	9	27	23	*80*	0	0	0	0	*0*	0	2	1	0	*3*

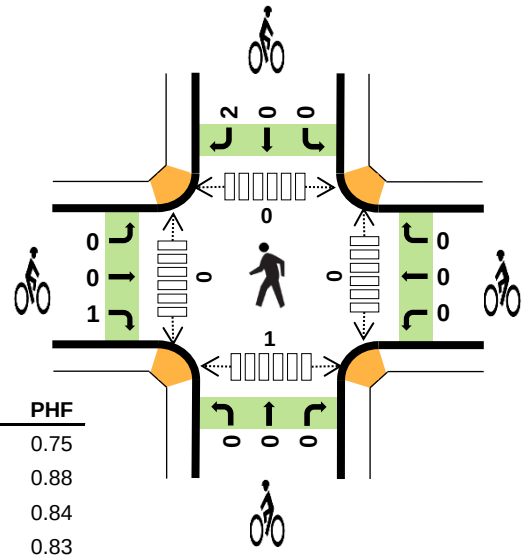
NM 14
NM 599

Peak Hour

Date: 09/28/2022
Count Period: 3:00 PM to 6:00 PM
Peak Hour: 4:30 PM to 5:30 PM



	HV %:	PHF
EB	3.9%	0.75
WB	1.4%	0.88
NB	2.9%	0.84
SB	2.0%	0.83
TOTAL	2.7%	0.95



Three-Hour Count Summaries

Interval Start	NM 599 Eastbound				Avenida Del Sur Westbound				NM 14 Northbound				NM 14 Southbound				15-min Total	Rolling One Hour
	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT		
4:30 PM	0	35	16	46	0	9	16	15	2	74	90	0	2	34	91	37	467	0
4:45 PM	0	31	25	49	0	6	21	10	0	56	77	0	0	28	82	26	411	0
5:00 PM	0	28	26	51	0	4	17	15	1	58	102	1	0	26	94	58	481	0
5:15 PM	0	42	37	75	0	5	12	10	1	54	40	1	1	43	123	40	484	1,843
Peak Hour All	0	136	104	221	0	24	66	50	4	242	309	2	3	131	390	161	1,843	0
Peak Hour HV	0	9	0	9	0	0	2	0	0	9	7	0	0	5	3	6	50	0
Peak Hour HV%	-	7%	0%	4%	-	0%	3%	0%	0%	4%	2%	0%	0%	4%	1%	4%	3%	0

Note: For all three-hour count summary, see next page.

Interval Start	Heavy Vehicle Totals					Bicycles					Pedestrians (Crossing Leg)				
	EB	WB	NB	SB	Total	EB	WB	NB	SB	Total	East	West	North	South	Total
4:30 PM	7	1	5	5	*18*	0	0	0	0	*0*	0	0	0	0	*0*
4:45 PM	7	1	5	4	*17*	0	0	0	0	*0*	0	0	0	0	*0*
5:00 PM	2	0	3	3	*8*	0	0	0	1	*1*	0	0	0	1	*1*
5:15 PM	2	0	3	2	*7*	1	0	0	1	*2*	0	0	0	0	*0*
Peak Hour	18	2	16	14	*50*	1	0	0	2	*3*	0	0	0	1	*1*

Project Manager: (415) 310-6469 project.manager.ca@idaxdata.com