DOCKETED	
Docket Number:	17-SPPE-01
Project Title:	McLaren Backup Generating Facility
TN #:	223744
Document Title:	Compilation of data clarification questions and responses for the McLaren Backup Generation Facility SPPE application review
Description:	Staff's review of the McLaren SPPE application
Filer:	Raquel Rodriguez
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	6/8/2018 2:39:32 PM
Docketed Date:	6/8/2018

State Of California — The Resources Agency of California

Memorandum

Date: June 8, 2018
Telephone: (916) 651-0966

To: Karen Douglas, Commissioner and Presiding Member
Janea A. Scott, Commissioner and Associate Member
Susan Cochran, Hearing Officer

From: California Energy Commission – Leonidas Payne
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Subject: **Compilation of data clarification questions and responses for the McLaren Backup Generation Facility SPPE application review**

In the course of Staff's review of the McLaren Backup Generation Facility Small Power Plant Exemption (SPPE) application and revised application [17-SPPE-01], Staff sent several requests for clarification of information directly to the applicant's representative. Those questions and responses are compiled here for referencing purposes.

McLaren SPPE Data Clarification Questions and Responses

Project Description:

First question

The Feb. 2017 IS/MND states that the project requires 32 generators and describes the three generator yards—two that would be encircled by 10-ft-tall yard fences with black slats and another (southern generator yard) that would be screened with a 28-ft-tall masonry wall. A separate "mechanical equipment yard" would include a 10-ft-tall yard fence with black slats.

By comparison, the SPPE application states that the generator yards are to be enclosed with 8-foot-tall chain link fencing to separate them from the rest of the site (p. 2-5 of the application). Also, there is no mention of the separate "mechanical equipment yard" described in the IS/MND.

Which is correct?

RESPONSE: The SPPE is correct. There is no plan for a 28-foot tall masonry wall for the MDC or the MBGF. The mechanical equipment yard is no longer part of the MDC or MBGF. The MBGF will include the three generator yards which will be enclosed with chain link fencing 8 to 10 feet high to keep people out of these areas. There will not be a screen wall to visually prevent seeing the generators.

Follow-up questions sent following receipt of the revised application

I can tell that this part of the application wasn't revised since you are still only referring to a single life safety generator:

"Construction of the MBGF will take place in three phases. Each phase represents a generation yard which will be constructed to serve each of the three MDC Buildings. Therefore Phase I will include 16 generators and the life safety emergency generator; Phase II will include 16 generators; and Phase III will include 15 generators."

What is the correct language?

RESPONSE: Each phase will have one life safety generator.

The application and revised application say this:

"Since the site preparation activities for the MDC will include the ground preparation and grading of the entire MDC site, the only construction activities associated with the MDC would involve construction within each generation yard."

I believe you meant to say "the only construction activities associated with the MBGF would involve construction within each generation yard."

Can you confirm?

RESPONSE: That is correct Lon.

Land Use:

I have a basic question about the on-site substation for the McLaren Data Center. The February 2017 IS/MND states that it covers 36,200 sq. ft. The SPPE Application reports it as 14,250 sq. ft. (p. 2-8), which is the only place in the Application where the square footage of the substation is mentioned. Can you please confirm the correct square footage for the revised project's substation?

The original configuration of the Substation, which serves the MDC and does not serve the MBGF, was 36,200 feet. The MDC is being reconfigured to be slightly larger and it resulted in some configuration of the layout of the substation (with Silicon Valley Power and City input). That reconfiguration is being evaluated by the City as it issues its addendum to the original IS/MND. You may be aware that the City is planning on using the CEC's analysis of the MBGF (which does not include the substation) by incorporating it into its Addendum to its IS/MND. Although I believe that the CEC should not be evaluating the substation because it is part of the MDC and not part of the MBGF, Vantage informed me that the current configuration of the MDC substation is now 20,860 square feet. Hope this is helpful.

Follow-up: Thank you for the building site plan for Building 1. I presume the drawing pertains to Phase I as discussed in the SPPE application, which includes Building A on the western portion of the site. The drawing shows that the eastern half of the site is "not in contract" and that existing buildings will remain on the site. We're speculating here that the building permit application submitted to the City a couple of weeks ago is for Building 1, its generator yard, and the substation, but it does not include the remaining two buildings?

The team has been informed that the entire site has been cleared of structures and initially graded. However, the drawing suggests that perhaps only the western half has been cleared? On page 2-7 of the SPPE application, it states that site preparation for the MDC will include ground preparation and grading of the entire MDC site. Can you clarify whether site clearing and grading is going to be done in two or perhaps three phases?

First, find attached a drawing of the full MDC development on both parcels. Second the first half of the site has been cleared but full grading has not been completed. Work on the second parcel will take place as described in the SPPE under later phases. The City previously approved development of the MDC on both parcels. Vantage has requested modifications to that plan with the City so approval of development on both parcels is being requested of the City. As described in the SPPE the original configuration of the MDC consisted of 4 phases. Vantage now proposes the City approved reconfiguration of the site and buildings to accommodate 3 phases. Demolition for the second parcel will take place as part of a future phase. The timing of that phase is related to customer demand and therefore does not have a start date yet.

Air Quality:

First Request

As you are probably aware, over the past few months Ramboll Environ, the AQ modeling contractor, has been in discussions with us regarding this project. We need the modeling computer files Ramboll used to evaluate the project for Appendix E, which contains the AQ and PH assessments. There were two versions of AERMOD sited. Appendix E on page 7 says version 15181 was used for CO, DPM, PM2.5 and TOG; the November 2017 document describing NO2 modeling, which follows Figure 3, says on page 4 of 7 that version 16216r was used for NO2.

1. Please explain why two different versions of AERMOD were apparently used. This was language that was not updated from the MND and is a typo. The same version as the NO2 modelling, version 16216r, was used for the AQ assessment.

2. Please tell us how we can obtain all modeling files so that we can fully understand the Ramboll assessment. We have provided the NO2 modeling files today via uplink provided by J. Hughes. We can also upload all other modeling files. Marie from DayZen is copied on this email and will obtain the other AQ modeling files and Public Health Assessment spreadsheets today.

Second Request

I understand that the project configuration and scope has evolved over time. I want to ensure that the Ramboll assessment is applicable to the currently-proposed project description. One point of confusion is that the SPPE application on Page 1-4 says that the original project configuration was of **two** four-story buildings constructed in **four** phases but that the "reconfigured MDC would consist of **three** four-story building constructed in **three** phases."

However, the air quality assessment of Appendix E on page 1 states that the proposed project would be developed over **four** construction phases from 2017 to 2022, with **three** office buildings. I have only had time so far to skim the documents for content, but I didn't find any description of the three (or four) phases of construction. Since Appendix E states there would be four construction phases beginning in 2017, it appears this is obsolete text.

3. Please clarify the timing and scope of each phase of construction. This is obsolete text that should have been updated. The description in the SPPE Application Page 1-4 correctly identifies the construction phases.

Follow-up from Scott:

Last Friday we docketed AppendixE-2 which was the complete application to the BAAQMD.

We are also docketing today and replacement Air Quality Technical Report to the version provide in Appendix E-1. As you know Gerry Bemis caught some inconsistencies that were

holdover from a previous version of the project description and reference to the wrong version of the air quality model. Ramboll Environ updated the report fixing those errors. During that review they also noticed that the stack heights in the original report were slightly lower than those used in the NO2 modeling report. The NO2 report is accurate so the AQTR was also revised and the HRA redone. No significant change.

We are seeking HARP2 modeling files. We have looked at all the files and cannot find HARP2 files. Can you have someone tell us the name of the health risk assessment (HRA) files and what modeling was done for the health risk assessment if HARP2 was not used? Also, the reason for not using HARP2 if it was not used.

Response: For flexibility sake, we use exact HARP2 methodology but we complete our calculations in an Access database. This allows us to calculate risks for a variety of exposure parameters and to quickly recalculate risks when we have updated dispersion factors.

Additional question following receipt of revised application

BACKGROUND: Staff noticed in the newly revised SPPE application there is a discrepancy staff needs to consider in order for some of my previous conclusions in the document to hold true. Please see the statement below that has been taken from the document.

Vantage Data Center's Revised SPPE Application for McLaren Backup Generating Facility - Air Quality and Public Health TN#223484, pdf page 4, first paragraph.

"The MBGF, as modified, will not exceed the BAAQMD CEQA thresholds except for NOx. As described in the MND, per BAAQMD's Rule 2-2, new sources that emit more than 10 tons per year of NOx but less than 35 tons of NOx must fully offset emissions to net zero using the BAAQMD small facility bank. If emissions from any facility are greater than 35 tons per year, the operator must provide offsets to zero. Due to the acceptance of a limit on average aggregate operating haurs for the generators at the MBGF, annual NOx emissions from the MBGF are less than 35 tons per year, and would total 4034.9 tons per year2, as shown in Table 4.4-2. Accordingly, the BAAQMD will provide offsets for NOx emissions from the backup generators from the BAAQMD small facility bank".

According to the paragraph above, because the project would have an annual (TPY) for NOx emission estimate of above 35 tons per year, the project need to provide offsets, rather than using the BAAQMD small facility bank.

Response: The error is mine. I took the projected emissions from the AQTR by mistake. The 40 tons in the AQTR was the maximum potential emissions that could occur assuming the max allowable 50 hours/year for all generators, **but Vantage will limit themselves through their permit with the BAAQMD to 34.9 tons** as before so that they can use the BAAQMD small facility bank. There should have been no modification to the NOx emission number in that sentence.

Questions regarding NO2 modeling following receipt of revised application

1. Fenceline receptors: Staff did not receive the receptor files (which are supposed to be located in the "aermap" folder) for the revised NO_2 modeling. Staff did a trial run for engine number EGEN_12A in 2013 for CAAQS with the receptor files provided by Ramboll previously. Staff got the maximum 1-hour NO_2 impact to be 223.1 $\mu g/m^3$, while Ramboll got 211.4 $\mu g/m^3$. Staff noticed that the locations of the fenceline receptors in the revised modeling are different from those in the original modeling. Staff would like clarification on whether the fenceline of the project would be changed. If not, why were fenceline receptors moved?

Response: The previous fenceline that was provided to Ramboll incorrectly represented the site so the fenceline in the model was revised to align with the representative site plan provided by the client. The fenceline location did not change, but it was not previously correctly represented in the site plan used to locate modeling receptors. The revised fenceline was created in the same manner as previously, with the same spacing. The modelling files provided include a receptor file with the correct fenceline receptors.

2. NO_2 background gap filling: Page 3 of the revised 1-hour NO_2 modeling report stated that when 3 or more consecutive hours were missing, the monthly-by-hour maximum for the 5-year period was used to substitute for the missing hours. However, staff noticed that Ramboll still used the 5-year 98th percentile value to substitute 3 or more consecutive hours of missing NO_2. Staff would like Ramboll to demonstrate that using the 5-year 98th percentile value is more conservative than using the monthly-by-hour maximum. Otherwise, staff will re-process the data with the monthly-by-hour maximum and re-run AERMOD to see if the final results would be changed.

Response: Please see comment for #3 below.

3. NO_2 background not included in CAAQS analysis: Staff noticed that even though the hourly NO_2 background file was included in the AERMOD input file, the NO_2 background was not actually included in the source group during modeling for the CAAQS. Therefore, the impacts for the CAAQS shown in the revised 1-hour NO_2 modeling report were all project impacts only, not total impacts (which would also include background). Staff needs to compare total impacts with the standards to conclude whether the project would cause exceedance of the CAAQS.

This was an inadvertent error, thank you for bringing it to our attention. Ramboll has revised the modelling analysis to correct the inclusion of NO2 background in the CAAQS analysis, and also revised the NO2 background gap filling to be consistent with comment #2 above (for both the NAAQS and CAAQS analysis) and also consistent with the language referred to on page 3 of the report. The updated modelling analysis is consistent with items #2 and #3 by using the monthly-by-hour maximum substitution for 3 or more consecutive hours of missing NO2 and by including the hourly background file in the CAAQS analysis to report total impacts. An updated redline report and modelling files have been provided.

4. Stack diameters: The applicant used 0.66 m and 0.36 m as the stack diameters for the emergency generators and life safety generators respectively. Staff was not able to find these stack diameters in the revised manufacturer's performance data sheets. Staff was only able to find the Reference Exhaust Stack Diameter of 12 in (0.3 m) on page 102 of 155 of the Revised SPPE Application (TN# 223484). However, page 106 of the same document says that the *Reference Exhaust Stack Diameter published with this*

dataset is only used for the calculation of Smoke Opacity values displayed in this dataset. This value does not necessarily represent the actual stack diameter of the engine due to the variety of exhaust stack adapter options available. Consult the price list, engine order or generol dimension drawings for the actual stack diameter size ordered or options availoble. Please verify that the actual stack diameters would be the same as modeled, i.e. 0.66 m and 0.36 m for the emergency generators and life safety generators respectively.

Ramboll consulted with Peterson/CAT to obtain stack diameters for the stack heights provided by the client. Peterson/CAT provided stack diameters for both the 2.75 MW and 600 kW generators based on the total allowable backpressure limit of the generator, taking into account length of pipe, elbows, and DPFs. The following are excerpts from communications with Peterson/CAT:

For 2,75 MW generator:

> *"Stack will be 26 or 28in depending on the restriction caused by the length of piping done by the installing contractor. The total restriction allowed is 27in H2O."*
> [26 inches was later confirmed over the phone with a CAT representative using the length of piping in their pressure drop tool]

For 600 kW generator:

> *"Peterson is estimating that 14in diameter exhaust with 2 x 90deg elbows and 35ft of exhaust pipe would impart 1.5 in H2O. The allowable limit of the engine is 40in H2O."*

Cultural/Tribal Cultural:

I have a few questions regarding the material submitted for the McLaren Backup Generating Facility SPPE.

1. I don't see any indication of a cultural resources report, literature search results or a technical report submitted under confidential cover so far. The Cultural Resources section of the February 2017 Initial Study and the SPPE Section 4.6 make no reference to any literature searches or other research conducted for the project, other than the survey of the two parcels involved. Appendix C.1 and C.2 contain the DPR forms for the parcels involved with the project but it does not appear any other survey work was completed. Will there be any more cultural resources background information submitted?

We have not performed any cultural resources report specifically for the MBGF. We are relying on the City's Mitigated Negative Declaration (MND) which was done for the McLaren Data Center Project and for the property upon which the MBGF would be located. We are also not aware of any additional cultural resources work that was done to support the MND for the MDC. We contacted the City of Santa Clara asking for any copies of confidential reports that may have been prepared and were told there are none and that the MND contains all of the cultural information used to support the MND.

2. I see no reference to AB 52 Tribal Cultural Resources which are included in the 2017 CEQA Guidelines checklist, p. 343, XVII. Were any tribal cultural resources identified?

The MND did not identify any tribal cultural resources.

3. Were tribal consultation letters sent? To which tribes and were there any responses?

The City did not send any tribal consultation letters as they explained that the area is highly industrial in nature and not near any known areas that may be sensitive to tribes.

4. Was the NAHC consulted for known sacred sites?

The City explained that it did not consult with NAHC because the site is highly disturbed, industrial in nature and not near any known areas that may be sensitive to tribes and no tribes requested consultation.

Water:

We are currently working to understand the proposed McLaren project, which for us will include the data center. To expedite the process and get working on the analysis I was hoping to have a couple of my technical questions answered. If these question are better suited for the formal data request format, please let me know. I acknowledge that question "4" might be better directed at the author of the referenced section of the Initial Study.

Vantage respectively disagrees that the Commission is evaluating the Mclaren Data Center (MDC). The Commission only has jurisdiction over the generating facilities and is not the lead CEQA agency for the MDC. The discretionary decision that the Commission is making is whether or not the MBGF (the facility over which it has jurisdiction) should be exempt from the AFC process and the CEC's permitting jurisdiction and whether the MBGF should be required to file an AFC. In fact, if the Commission granted the SPPE for the MBGF, the City would be the lead agency under CEQA for the MBGF since it would be the sole land use agency with authority to allow the MBGF to be constructed and operated within its jurisdictional territory. With that in mind, we believe it is important for the Commission to consider the effects of the MDC at the same time as the effects of the MBGF but should only do so where the MBGF is contributing to MDC effects identified in the City's IS/MND. The Commission should not be evaluating whether it believes the IS/MND for the MDC is adequate as the IS/MND is solely within the City's jurisdiction and discretion. For water supply, there would be no contribution to previously identified MDC effects because the MBGF will not use potable water or recycled water for cooling or any other purposes. The generation yards that will accommodate the MBGF facilities will be graded as part of the overall construction of the MDC site and therefore, the MBGF will not contribute to any water use related effects that may occur for the MDC.

1. It is not clear what entity will provide potable water. Please identify the supplier and does the project have a "will-serve" letter or other commitment for service of the potable water? No entity will provide water for the MBGF. Potable water will be provided by the City of Santa Clara Water and Sewer Utilities. The MDC does not have a will-serve letter but as the IS/MND, which was prepared by the City of Santa Clara, concludes on page 135 that "....the water demand generated by the project would not exceed the capacity of the City's Water and Sewer Utility to provide water services to the project site and adequate potable water supply services are available to serve the project.

2. It is not clear what entity will provide recycled water. Please identify the supplier and does the project have a "will-serve" letter or other commitment for service of recycled water? No entity will provide recycled water for the MBGF. Recycled water will be provided by the City of Santa Clara Water and Sewer Utilities. The MDC does not have a will-serve letter but as the IS/MND, which was prepared by the City of Santa Clara, concludes on page 135 that "....the water demand generated by the project would not exceed the capacity of the City's Water and Sewer Utility to provide water services to the project site and adequate recycled water supply services are available to serve the project.

3. It is not clear what entity will receive wastewater from the project. Please identify the proposed treatment facility. Does the project have a "will-serve" letter or other commitment for receiving the wastewater discharge? No entity will treat wastewater for the MBGF. The IS/MND identifies at page 135 that the MDC's wastewater flow will be treated by the Regional Wastewater Facility, which is the San Jose and Santa Clara Regional Wastewater Facility. The

MDC does not have a will-serve letter but as the IS/MND, which was prepared by the City of Santa Clara, concludes on page 136 that "According to the Sanitary Sewer Capacity Evaluation prepared for the project, there is adequate capacity in the wastewater conveyance system for the flows that would be generated by the project and no improvements would be needed.

4. The city says on page 134 of their Initial Study that "The project would increase the water demand on the project site beyond existing conditions..." Do you know what the current demand for potable water is at the site? Vantage is not aware of what the demand for potable water was at the MDC site. Since demolition at the MDC site is now complete, there is no current potable water demand.

Population/Housing:

I have a clarification question for the applicant regarding the number of construction phases for the MDC. In the city of Santa Clara's IS/MND four phases of construction are identified; however, in the applicant's response to my Population and Housing Data Request question about phasing of the MDC, the applicant identified three phases, as does page 2-8 of the MGBF SPPE.

Can you have the applicant clarify whether there are three or four phases of construction for the MDC? If there are four, I would like the duration of that phase and estimated completion year.

There are now three phases for the MDC. The IS/MND evaluated the MDC which had originally four phases and 32 generators to support them. As discussed in Section 1.3, the City is currently processing an amendment to the original MDC which reconfigures the buildings slightly to increase the square footage of the data center and adds the additional 16 generators to the 32 covered by the IS/MND. This amendment also changes the phasing from 4 to 3.

Section 1.3 identifies that the City will be amending the IS/MND to cover the changes to the MDC and will incorporate and reference Staff's analysis of the MBGF which will include all 48 generators in the three generation yards to correspond with each of the 3 MDC phases.

BACKGROUND: Construction Workforce

The Project Description section on page 2-7 of the Application for Small Power Plant Exemption (SPPE) for the McLaren Backup Generating Facility (MBGF) discusses project construction of the MBGF. There would be three phases of construction; one for each generation yard, each lasting six months and requiring 10-15 construction workers including a crane operator.

The city of Santa Clara's Initial Study/Mitigated Negative Declaration (city's IS/MND) published in February 2017 for the McLaren Data Center (MDC) was submitted with the MBGF SPPE application as Appendix B Part 1. On page 126 in the Traffic and Transportation discussion, the city's IS/MND notes that the peak number of construction workers on site would be 300. On page 38 in the Air Quality Impacts discussion, the city's IS/MND notes that construction of MDC would occur in four phases from 2017 to 2022 with a maximum of two phases that would occur simultaneously.

There is no discussion of where the construction workers are anticipated to come from for the MDC and MBGF and very little information about the construction workforce needed for the construction of MDC and duration of construction. Staff has the following data requests.

1. Please estimate what percent of construction workers would come from the local area (e.g. within a two hour commute) compared with how many workers may come from further and thus may temporarily relocate closer to the project site. Please identify the local versus non-local workforce estimates for MDC and MBGF separately.

RESPONSE: Based on its experience with the demolition work performed at the MDC site, which is now complete, and construction at its other data center locations, all of the construction workers for the MDC are within a 2-hour commute of the site and are considered local to the greater Bay Area.

It is important to note that the number of construction of workers estimated for the MBGF in the SPPE Application are a subset of the total estimated number of construction workers evaluated by the IS/MND for the entire MDC, which at that time included 32 backup generators. The increase in the number of generators did not result in additional construction personnel for the current configuration of the MBGF.

2. Please provide an estimate of the monthly average number of construction workers for MDC.

RESPONSE: Vantage estimates that the monthly average number of construction workers for the MDC is approximately 100.

3. Please clarify the construction duration and phasing for MDC, including duration of each phase, including overall construction schedule (monthly) so staff can identify any periods when no construction would occur.

RESPONSE: The timing of the phasing for ultimate buildout of the MDC depends on the ultimate demand for the data center services. At this time it is estimated that Phases 1 and 2 will be constructed within 2018 and 2019. As described in the SPPE, installation of the MBGF generator yards are specific to each phase. Since the amount of construction work necessary to install the generators in the generator yards is relatively minor compared to the overall construction of the MDC, Vantage estimates that the construction activities from construction of each MBGF phase would be a very small part of the overall construction and will be integrated into the overall construction of the MDC. At this time it is anticipated that the first generators will be installed to support Phase I will be in May. Vantage estimated generator yards would take six months to complete in the SPPE Application, but it is not expected that construction in the generator yard would be continuous for the entire 6 months.

It is possible that the timing of later phases of the MDC would result in times when there is no construction on site, however, it is impossible to accurately predict at this time since the timing would depend on the market of Vantage's data center services.

BACKGROUND: Operations Workforce

The environmental impact analysis discussion on page 4-49 in the Population and Housing section of the MBGF SPPE application states that 29 operations workers would be employed at the MDC.

On page 127 of the city's IS/MND, the Traffic and Transportation discussion states that at full build-out of the MDC, the proposed project is anticipated to employ approximately 29 employees, including 14 operations personnel, 13 security personnel, and 2 janitors. Security and operations personnel would be employed in shifts, resulting in a maximum of 16 employees on-site in a given day (9 operations personnel, 5 security personnel, and 2 janitors).

There is no discussion of from where the new employees are anticipated to come. Staff has the following data request.

4. Please estimate what percent of operations workers would come from the local area (e.g. within a one hour commute) compared with how many workers may come from further and thus may relocate closer to the project site.

RESPONSE: Vantage estimates that the operations workers for the MDC would come from the Greater Bay Area. It is important to note that the MBGF operations employees are a subset of the total number of employees for the MDC. The IS/MND concluded that the operations workforce for the MDC would have a negligible effect on population and housing.

Public Services:

BACKGROUND: Service Ratios, Response Times, or Other Performance Measures

The setting discussion on page 4-50 in the Public Services section of the Application for Small Power Plant Exemption (SPPE) for the McLaren Backup Generating Facility (MBGF) notes that fire protection is provided by the Santa Clara Fire Department, emergency medical services are provided by Santa Clara Emergency Medical Services, and police protection is provided by the Santa Clara Police Department. The closest park to the project site is also noted.

The Public Services section of the city of Santa Clara's Initial Study/Mitigated Negative Declaration (city's IS/MND) published in February 2017 for the McLaren Data Center (MDC) and submitted with the MBGF SPPE application as Appendix B Part 1 includes additional information about the public service providers. Additional information about the service providers is included, such as the staffing numbers for fire and police services, including the location of the closest service facility to the project site on page 118. However, there is not the necessary service ratios, response times, or other performance standards included for these providers that would support the conclusions in the impact discussion. This information is also missing from the discussion on schools and parks.

Discussion of the acceptable service ratios, response times or other performance objectives for these public service providers has not been included in either the MBGF SPPE application or the city's IS/MND for the MDC. Staff has the following data request.

1. Please provide the acceptable service ratios, response times or other performance objectives for the Santa Clara Fire Department, Santa Clara Emergency Medical Services, Santa Clara Police Department, and Santa Clara Parks & Recreation Department so staff can assess if the project could impact these ratios. Please also identify the estimated response times for fire, medical, and police protection to the project site.

RESPONSE: The following information was taken directly from the City Place Final EIR; which can be accessed at the following link.
http://www.santaclaraca.gov/Home/Components/BusinessDirectory/BusinessDirectory/135/3650?alpha=C

The SCFD uses the nationally recognized National Fire Protection Association 1710 response standard. Using a model based on services provided 90 percent of the time, the SCFD standard is 4 minutes for the first-arriving unit for 90 percent of high-level emergency calls. The SCFD standard is less than 8 minutes for paramedic units for 90 percent of calls. Fire Station 10 and Fire Station 6 currently meet the SCFD standard for the first-arriving unit and paramedic units, respectively. The SCFD is currently meeting the SCFD response time standard for high-level emergency calls but is only meeting the response time standard for paramedic units for 85 percent of calls.

As of 2013, the SCPD is serving a population of approximately 119,075 residents, resulting in a ratio of 1.22 officers per 1,000 residents. The SCPD also serves a daytime population of approximately 204,852 residents and employees, resulting in a ratio of 0.71 officer per 1,000 residents and employees. The goal of the SCPD is to increase staffing to improve its ratio of 1.22 officers per 1,000 residents to reach the national average of 1.7 officers per 1,000 residents. In 2014, the SCPD received 184,992 emergency 911 calls, which resulted in approximately 61,394 actual calls for service. The SCPD's response time standard

is 3 minutes or less for 90 percent of high-priority calls, as outlined in the General Plan. Currently, the SCPD has an average response time of 3 minutes 35 seconds to high-priority calls for service, resulting in a response time that is slightly higher than the standard. Currently, the SCPD requires additional police officers and support staff to meet the SCPD's response time goals. The SCPD participates in a mutual aid agreement with the other law enforcement jurisdictions in Santa Clara County.

The City has approximately 299 acres of parks and open space areas that serve the community, resulting in 2.53 acres of parkland per 1,000 residents. The existing ratio is less than the City standard of 3.0 acres per 1,000 residents as specified in Santa Clara City Code Chapter 17.35.23 A.