DOCKETED	
Docket Number:	20-SPPE-02
Project Title:	Lafayette Backup Generating Facility
TN #:	241496
Document Title:	Lafayette Data Requests Set 4
Description:	data requests
Filer:	Lon Payne
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	2/9/2022 9:15:52 AM
Docketed Date:	2/9/2022

CALIFORNIA
ENERGY COMMISSION

February 9, 2022

Digital Realty
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, California 95608

Data Requests Set 4 for Lafayette Backup Generating Facility (20-SPPE-02)

Dear Mr. Galati:

Pursuant to Title 20, California Code of Regulations, sections 1941 and 1716, California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 4, which is necessary for a complete staff analysis of the Lafayette Backup Generating Facility (LBGF) and associated Lafayette Data Center (LDC), collectively the "project" under the California Environmental Quality Act (CEQA).

Responses to the data requests are due to staff within 30 days. If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send written notice to me and the Committee within 20 days of receipt of this letter. Such written notification must contain the reasons for not providing the information, the need for additional time, or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please email me at leonidas.payne@energy.ca.gov.

_____/S/_____

Leonidas Payne
Project Manager

Enclosure: Data Requests Set 4

LAFAYETTE BACKUP GENERATING FACILITY SPPE
DATA REQUESTS SET 4

TRANSPORTATION

BACKGROUND: CITY OF SANTA CLARA VEHICHLE MILES TRAVELED (VMT) ANALYSIS AND APPLICATION OF INDUSTRIAL VMT THRESHOLD

The city of Santa Clara's VMT Policy states the Countywide Average VMT (16.64) is the environmental baseline. For industrial use project types, the threshold of determination of a significant transportation impact is 15 percent *below* the existing Countywide VMT per employee, which is 14.14 VMT (Santa Clara 2020). CEC staff used the Santa Clara County (SCC) VMT Evaluation Tool to determine if the project generated VMT (15.89) exceeds the industrial VMT threshold per employee (14.14). The project, as proposed, exceeds the industrial threshold by 1.75 VMT. See **Attachment A** for VMT screening details. For the city of Santa Clara to be able to rely on the CEC's CEQA document as a responsible agency, a VMT analysis is required for the project. Project VMT must be evaluated using the SCC VMT Evaluation Tool and must include consideration of the city's VMT thresholds of significance. The project applicant should coordinate with the city of Santa Clara to determine the appropriate Transportation Demand Management (TDM) measures to reduce the project generated VMT to a level 15 percent below the industrial VMT per employee threshold.

DATA REQUESTS

130. Prepare and submit a VMT analysis for the project in accordance with city of Santa Clara's VMT Policy.
131. Coordinate with the city of Santa Clara to identify mitigation measures that would reduce the project generated VMT to a level below the industrial VMT threshold (14.14.). In the VMT analysis, include the city approved TDM measures containing monitoring and/or reporting requirements for the verification of implementation.

REFERENCE

Santa Clara 2020 – Santa Clara Transportation Analysis Policy Update. Resolution No. 20-8861, dated June 23, 2020. Exhibit A, Table 1 Project Type and VMT threshold of Significance. Available online at: https://www.santaclaraca.gov/home/showpublisheddocument/71449/637459525139300000

Attachment A

Santa Clara Countywide VMT Evaluation Tool - Version 2 - Report

Project Details

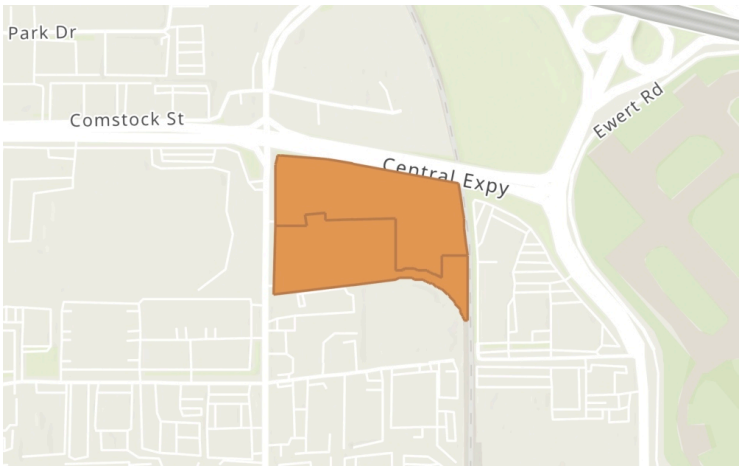
Timestamp of Analysis	November 05, 2021, 01:00:10 PM
Project Name	Lafayette Backup Generating Facility or Lafayette Data Center
Project Description	576,120 SF data center building, utility substation, generator equipment yard, surface parking and landscaping

Project Location Map

Jurisdiction:

Santa Clara

APN	TAZ
22404093	1229
22404094	1229



Analysis Details

Data Version	VTA Countywide Model December 2019
Analysis Methodology	TAZ
Baseline Year	2021

Project Land Use

Residential:

Single Family DU:

Multifamily DU:

Total DUs: 0

Non-Residential:

Office KSF:

Local Serving Retail KSF:

Industrial KSF: 576

Residential Affordability (percent of all units):

Extremely Low Income: 0 %

Very Low Income: 0 %

Low Income: 0 %

Parking:

Motor Vehicle Parking:

Bicycle Parking:

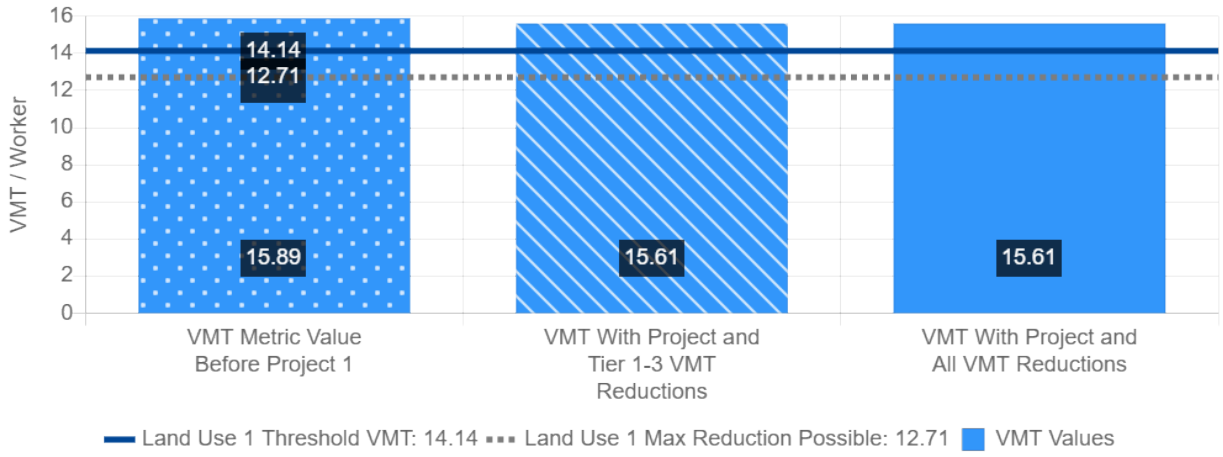
Proximity to Transit Screening

Inside a transit priority area? No (Fail)

Industrial Vehicle Miles Traveled (VMT) Screening Results

Land Use Type 1:	Industrial
VMT Metric 1:	Home-based Work VMT per Worker
VMT Baseline Description 1:	County Average
VMT Baseline Value 1:	16.64
VMT Threshold Description 1 / Threshold Value 1:	-15% / 14.14
Land Use 1 has been Pre-Screened by the Local Jurisdiction:	N/A

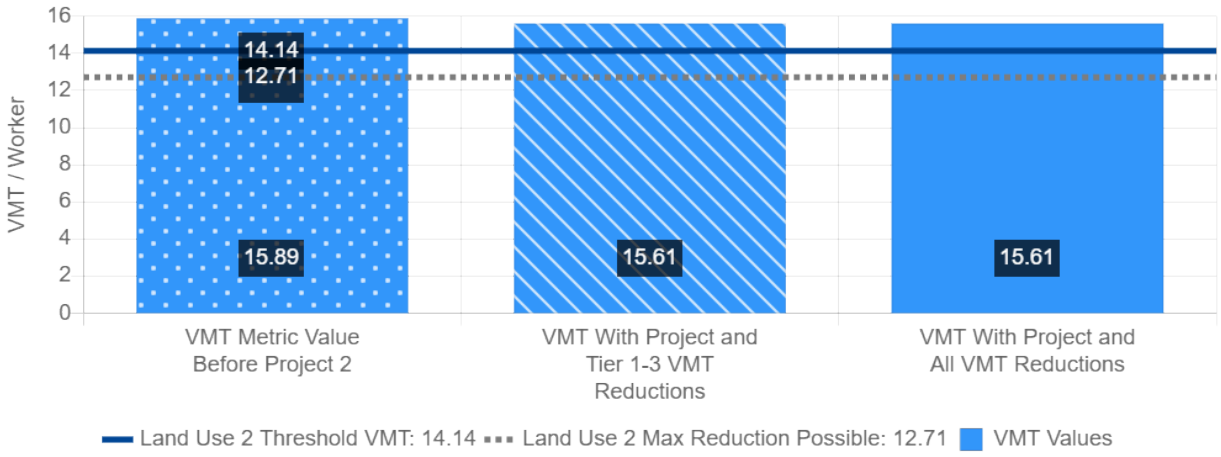
	Without Project	With Project & Tier 1-3 VMT Reductions	With Project & All VMT Reductions
Project Generated Vehicle Miles Traveled (VMT) Rate	15.89	15.61	15.61
Low VMT Screening Analysis	No (Fail)	No (Fail)	No (Fail)



Industrial Vehicle Miles Traveled (VMT) Screening Results

Land Use Type 2:	Industrial
VMT Metric 2:	Home-based Work VMT per Worker
VMT Baseline Description 2:	County Average
VMT Baseline Value 2:	16.64
VMT Threshold Description 2 / Threshold Value 2:	-15% / 14.14
Land Use 2 has been Pre-Screened by the Local Jurisdiction:	N/A

	Without Project	With Project & Tier 1-3 VMT Reductions	With Project & All VMT Reductions
Project Generated Vehicle Miles Traveled (VMT) Rate	15.89	15.61	15.61
Low VMT Screening Analysis	No (Fail)	No (Fail)	No (Fail)



Tier 1 Project Characteristics

PC01 Increase Residential Density

Existing Residential Density:	
With Project Residential Density:	

PC02 Increase Residential Diversity

Existing Residential Diversity Index:	0.6
With Project Residential Diversity Index:	0.45

PC03 Affordable Housing

PC04 Increase Employment Density

Existing Employment Density:	18.32
With Project Employment Density:	29.04