DOCKETED	
Docket Number:	23-SPPE-01
Project Title:	STACK SVY03A Data Center Campus
TN #:	258028
Document Title:	STACK Responses to CEC Staff Data Request Set 4 - SVY03A Campus
Description:	N/A
Filer:	Scott Galati
Organization:	DayZenLLC
Submitter Role:	Applicant Representative
Submission Date:	7/26/2024 8:03:55 AM
Docketed Date:	7/26/2024

RESPONSES TO CEC STAFF DATA REQUEST SET 4 (59-62)

STACK SVY03A Campus (23-SPPE-01)

SUBMITTED TO: CALIFORNIA ENERGY COMMISSION
SUBMITTED BY: **STACK Infrastructure**

July 2024

DAYZEN LLC

INTRODUCTION

Attached are STACK Infrastructure's (STACK) responses to California Energy Commission (CEC) Staff Data Request Set No. 4 (59-62) for the SVY03A Data Center Campus (SVY03A Campus) Application for Small Power Plant Exemption (SPPE) (23-SPPE-01). Staff issued Data Request Set No. 4 on June 19, 2024.

The Data Responses are grouped by individual discipline or topic area. Within each discipline area, the responses are presented in the same order as Staff presented them and are keyed to the Data Request numbers (59-62). Additional tables, figures, or documents submitted in response to a data request (e.g., supporting data, stand-alone documents such as plans, folding graphics, etc.) are found in Attachments at the end of the document and labeled with the Data Request Number for ease of reference.

For context, the text of the Background and Data Request precede each Data Response.

GENERAL OBJECTIONS

STACK objects to all data requests that require analysis beyond which is necessary to comply with the California Environmental Quality Act (CEQA) or which require STACK to provide data that is in the control of third parties and not reasonably available to STACK. Notwithstanding this objection, STACK has worked diligently to provide these responses swiftly to allow the CEC Staff to prepare the Draft Environmental Impact Report (DEIR).

TRAFFIC AND TRANSPORTATION

BACKGROUND

The transportation analysis must evaluate the adequacy of the site access and circulation during project construction and operation. This requires review of turning templates that illustrate how vehicles would circulate and access on-site facilities. To date, CEC staff has access to the WB-62 truck turning templates included within the SVY03A Data Center Campus Application Part VI - Appendix H – Transportation Impact Assessment. The application also states the driveway on Eden Landing Road east of the main entrance would be used for Pacific Gas & Electric Company to access its switching station. However, no turning movements are provided for that driveway. Staff requires fire truck turning templates as well as clarification on the function of the driveway serving the switching station.

DATA REQUESTS

59. Provide truck turning templates for fire trucks entering and exiting the project site via entrances on Production Avenue and Eden Landing Road and navigating the project site.

RESPONSE TO DATA REQUEST 59

Truck turning templates are provided in Exhibit C-600 as Attachment TRANS DR-59. The minimum inside radius is 17 feet and the maximum outside radius is 45 feet.

60. Provide a description of the vehicle types, and necessary maneuvers to which the 26-foot-wide driveway serving the switching station will be used, including turning movements for this driveway.

RESPONSE TO DATA REQUEST 60

Turning movements for a WB-62 truck have been provided for access in and out of the switching station as well as around the site as shown in Exhibit C-700 Attachment TRANS DR-60.

BACKGROUND

The transportation analysis must evaluate whether the proposed project construction would comply with Code of Federal Regulations (14 CFR § 77.5 et. seq) requiring notification to be sent to the Federal Aviation Administration (FAA) for any construction or alterations exceeding 200 feet above ground level (AGL). The application indicates the project would be constructed using cranes that may exceed the final building height but does specify a maximum height. Per Data Request #1 and #3, staff understands FAA Form 7460-1 Notice of Proposed Construction or Alternation was submitted to the FAA on December 6, 2023, and staff will look for the FAA's response in future docketed materials. Staff does, however, need clarification on the anticipated height of construction activity.

DATA REQUEST

61. Provide the maximum height AGL to which construction equipment would extend

RESPONSE TO DATA REQUEST 61

STACK disagrees with Staff's assertion that for a CEQA analysis the height of the construction cranes must be identified. The contractor will ultimately file the appropriate FAA 7460-1 forms for cranes if required in accordance with the federal regulations. CEQA specifically authorizes a lead agency to rely on laws and regulations begin enforced by the agency with jurisdiction. In this case, the agencies with jurisdiction would be the City of Hayward and the FAA. STACK refers to the recent certified Final Environmental Impact Report (FEIR) for the 651 Martin Backup Generating Facility at page 4.7-12 (provided below) for a representative approach Staff has taken in prior SPPE applications without the need to identify the height of construction cranes.

> Project construction is expected to require equipment that would exceed this height, including the use of a crane for placement of each generator within the generation yard. As a result, the project applicant is required to submit Form 7460- 1, Notice of Proposed Construction or Alteration, to the FAA for any construction equipment over 21.6 feet AGL in height. The FAA would then review the project and provide a determination of whether the equipment is a hazard to aviation. (It should be noted that the FAA generally grants a Determination of No Hazard for temporary construction equipment, accompanied by conditions with which the applicant must comply, such as lighting and marking of the equipment for visibility.) The City of Santa Clara, as the permitting agency for the project, would ensure consistency with this requirement and compliance with any of the FAA's conditions. Therefore,

project construction would be consistent with 14 CFR § 77.9, ensuring that construction equipment would not result in aviation hazards.

STACK requests Staff include a similar assessment in the EIR for this Project as performed in prior SPPE FEIRs.

BACKGROUND

Per the application, staff understands demolition, grading, excavation, and construction is anticipated to require approximately 22 months. Staff also understands site grading would require up to 3,700 cubic yards of imported fill. The application does not indicate the timing and number of truck trips required to deliver the imported fill. This information is required to provide an accurate estimate of project construction trip generation.

DATA REQUEST

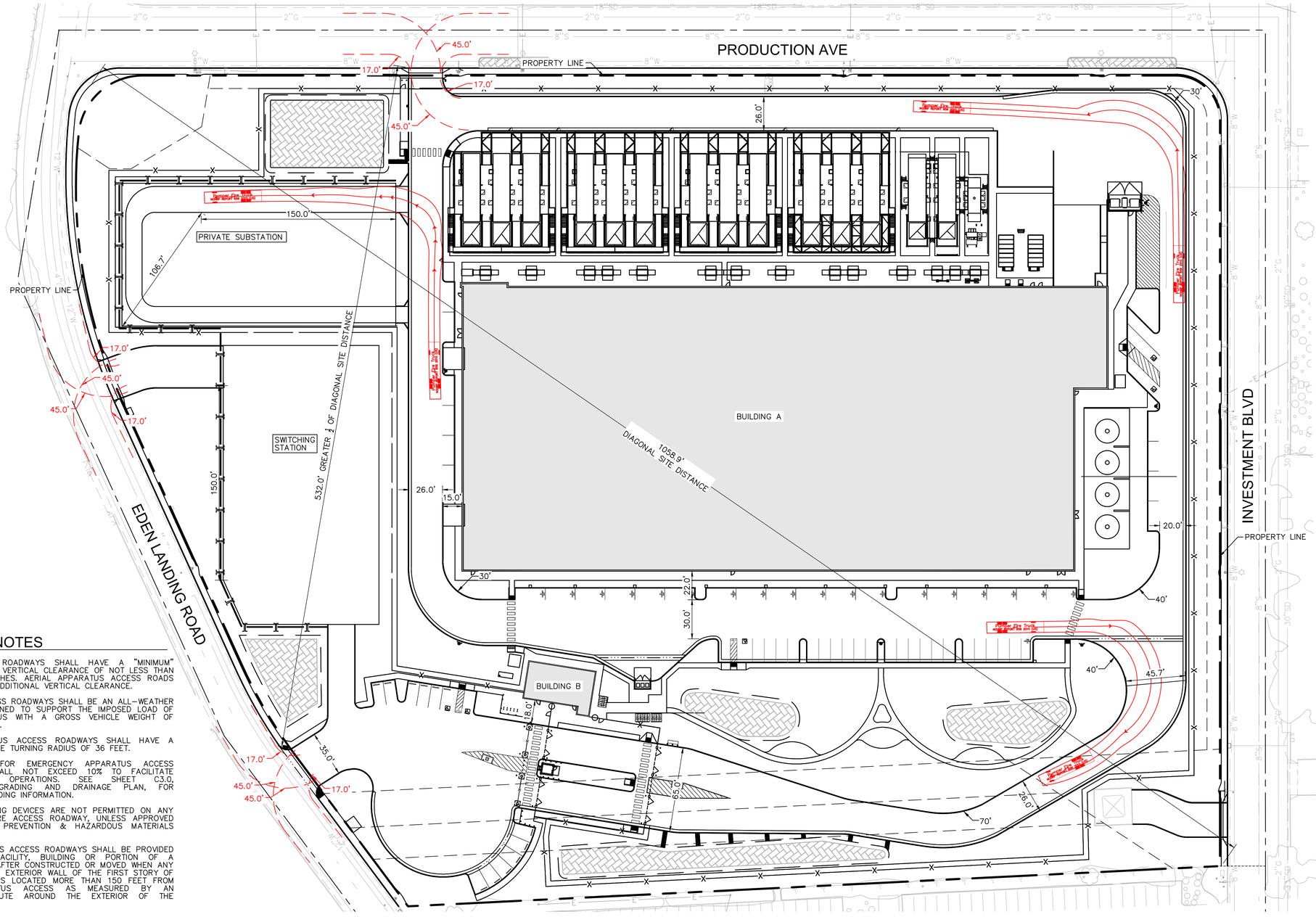
62. Provide the estimated number of truck trips required to deliver the estimated 3,700 cubic yards of imported fill for site grading. Indicate the period of time over which these truck trips would occur within the construction timeframe as well as the average and maximum number of daily truck trips required to deliver the imported fill during this period. Indicate the cubic yard per truck assumption used to develop these estimates.

RESPONSE TO DATA REQUEST 62

The amount of imported fill has been increased to approximately 7,000 cubic yards due to the site redesign associated with the elimination of SVY03B data center building as described in the Revised Project Description. The delivery imported fille will take place during mass grading activities. Mass grading activities are anticipated to begin after demolition activities are completed in approximately month 3 of the construction schedule and last for approximately 2 months. Using a conservative capacity of typical dump truck of approximately 15 cubic yards per truck, the total estimate of truck trips to deliver 7,000 cubic yards of import material to the site would be approximately 467 trips over a two month period. This would equate to approximately 10 trucks per workday. It is possible that larger articulated trucks may be used which could reduce the truck trips to approximately 5 trucks per workday.

ATTACHMENT TRANS DR-59

Exhibit C-600 Preliminary Fire Access



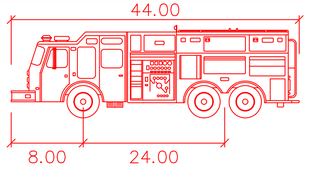
GENERAL NOTES

1. FIRE ACCESS ROADWAYS SHALL HAVE A "MINIMUM" UNOBSTRUCTED VERTICAL CLEARANCE OF NOT LESS THAN 13 FEET 6 INCHES. AERIAL APPARATUS ACCESS ROADS MAY REQUIRE ADDITIONAL VERTICAL CLEARANCE.
2. ALL FIRE ACCESS ROADWAYS SHALL BE AN ALL-WEATHER SURFACE DESIGNED TO SUPPORT THE IMPOSED LOAD OF FIRE APPARATUS WITH A GROSS VEHICLE WEIGHT OF 75,000 POUNDS.
3. FIRE APPARATUS ACCESS ROADWAYS SHALL HAVE A "MINIMUM" INSIDE TURNING RADIUS OF 36 FEET.
4. THE GRADE FOR EMERGENCY APPARATUS ACCESS ROADWAYS SHALL NOT EXCEED 10% TO FACILITATE FIRE-GROUND OPERATIONS. SEE SHEET C3.0, PRELIMINARY GRADING AND DRAINAGE PLAN, FOR PROPOSED GRADING INFORMATION.
5. TRAFFIC CALMING DEVICES ARE NOT PERMITTED ON ANY DESIGNATED FIRE ACCESS ROADWAY, UNLESS APPROVED BY THE FIRE PREVENTION & HAZARDOUS MATERIALS DIVISION.
6. FIRE APPARATUS ACCESS ROADWAYS SHALL BE PROVIDED FOR EVERY FACILITY, BUILDING OR PORTION OF A BUILDING HEREAFTER CONSTRUCTED OR MOVED WHEN ANY PORTION OF AN EXTERIOR WALL OF THE FIRST STORY OF THE BUILDING IS LOCATED MORE THAN 150 FEET FROM FIRE APPARATUS ACCESS AS MEASURED BY AN APPROVED ROUTE AROUND THE EXTERIOR OF THE BUILDING.

LEGEND

- PROPERTY LINE
- RIGHT OF WAY LINE
- BUILDING SETBACK LINE
- PROPOSED CHAIN LINK FENCE
- BIORETENTION AREA

DESIGN TRUCK



Pumper Fire Truck

	feet
Width	: 8.50
Track	: 8.50
Lock to Lock Time	: 6.0
Steering Angle	: 37.8

TEST NO: 747

WORK ORDER INFORMATION	
MUNIS ACCOUNT:	605-33210
NEXGEN WO NUMBER:	9249
DATE ISSUED:	7/27/2022
APPLICATION NUMBER:	7513

HAYWARD WATER SYSTEM

FIRE FLOW TEST

DATE: 7/29/2022 TIME: 2:00 PM TEST BY: Water Distribution

APPROXIMATE LOCATION: 26010 Eden Landing Rd

NOTES:

HYDRANT NUMBER	APPROXIMATE LOCATION	PRESSURE --- PSI Static *	Residual Pitot	Orifice	DISCHARGE --- GPM Observed	20 psi calc
3114-02	Production Ave	108	100	2.5	1,591.8	5,811.0
3114-03	Production Ave		90	2.5		

* When conducting the design of any fire protection system, a maximum static pressure of 80 psi should be used. Residual pressures used for the calculation should be adjusted accordingly.

TEST NO: 748

WORK ORDER INFORMATION	
MUNIS ACCOUNT:	605-33210
NEXGEN WO NUMBER:	9254
DATE ISSUED:	7/27/2022
APPLICATION NUMBER:	7514

HAYWARD WATER SYSTEM

FIRE FLOW TEST

DATE: 7/29/2022 TIME: 1:00 PM TEST BY: Water Distribution

APPROXIMATE LOCATION: 26010 Eden Landing Rd

NOTES:

HYDRANT NUMBER	APPROXIMATE LOCATION	PRESSURE --- PSI Static *	Residual Pitot	Orifice	DISCHARGE --- GPM Observed	20 psi calc
3114-01	Eden Landing Rd & Production Ave	108	100	2.5	1,574.0	5,746.0
3114-06	26010 Eden Landing Rd		88	2.5		

* When conducting the design of any fire protection system, a maximum static pressure of 80 psi should be used. Residual pressures used for the calculation should be adjusted accordingly.

NORTH

GRAPHIC SCALE IN FEET
0 20 40 80

811 Know what's below. Call before you dig.

CONFIDENTIAL

PROJECT ADDRESS

26062 EDEN LANDING RD
HAYWARD, CA 94545

PROJECT DELIVERY PACKAGE

ENTITLEMENT REVIEW

SEAL/SIGNATURE

PRELIMINARY
THESE DOCUMENTS ARE INCOMPLETE AND NOT FOR REGULATORY APPROVAL, PERMIT OR CONSTRUCTION

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ISSUE DATE: 2 JAN 2023	PROJECT NO: 197459004
DESIGNED: KIMLEY-HORN	ARCHITECT: HKS

MARK	DATE	DESCRIPTION

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ELECTRICAL ENGINEER
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Suite 5300
Chicago, Illinois 60606

PROJECT: BUILDING A

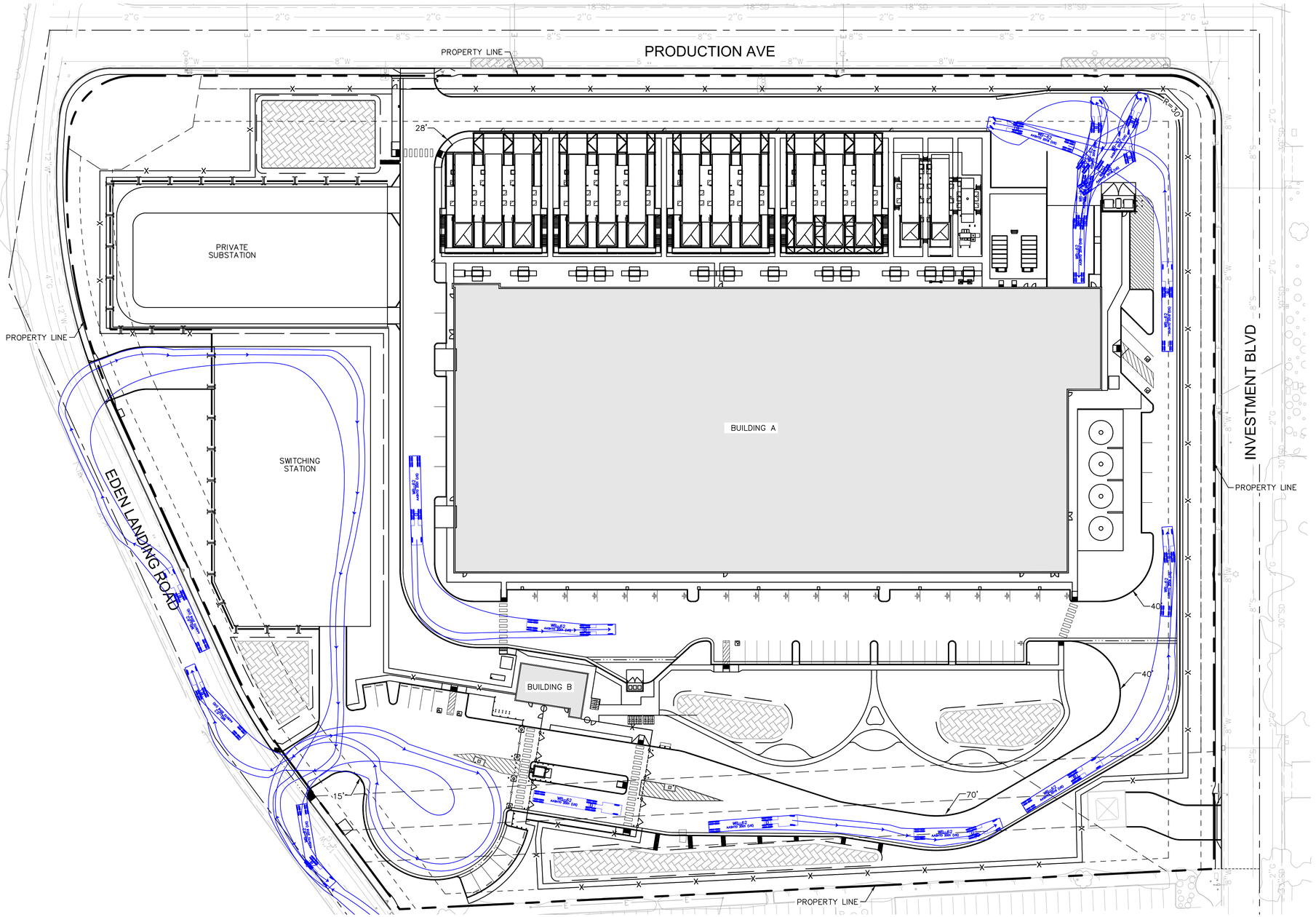
TITLE: PRELIMINARY FIRE ACCESS

DRAWING: C-600

E1	SCALE:	AGILE No:	REV:

ATTACHMENT TRANS DR-60

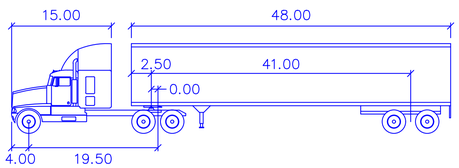
Exhibit C-700 Preliminary Truck Turning



LEGEND

- PROPERTY LINE
- RIGHT OF WAY LINE
- BUILDING SETBACK LINE
- PROPOSED CHAIN LINK FENCE
- BIORETENTION AREA

DESIGN VEHICLES



WB–62

feet

Tractor Width	: 8.00	Lock to Lock Time	: 6.0
Trailer Width	: 8.50	Steering Angle	: 28.4
Tractor Track	: 8.00	Articulating Angle	: 70.0
Trailer Track	: 8.50		

NORTH

GRAPHIC SCALE IN FEET
0 20 40 80

811 Know what's below. Call before you dig.

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Chicago, Illinois 60606

PROJECT: BUILDING A

TITLE: PRELIMINARY TRUCK TURNING

DRAWING: C-700

E1	SCALE:	AGILE No:	REV: