

**DOCKETED**

<b>Docket Number:</b>	20-SPPE-02
<b>Project Title:</b>	Lafayette Backup Generating Facility
<b>TN #:</b>	243150
<b>Document Title:</b>	Record of Conversation
<b>Description:</b>	ROC with Ryan Sheelen and Mark Connolly
<b>Filer:</b>	Lon Payne
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	5/19/2022 1:27:23 PM
<b>Docketed Date:</b>	5/19/2022

**Siting,  
Transmission and  
Environmental  
Protection Division**

**FILE:** n/a

**PROJECT TITLE:** Lafayette Backup  
Generating Facility

**Docket:** 20-SPPE-02

**TECHNICAL AREA(s):** Transportation

Telephone

Email

Meeting Location: N/A

**NAME(s):** Ashley Gutierrez,  
Planner II, CEC

**DATE:** 4/06 to 5/13, 2022

**TIME:** 10:30AM

**WITH:** Ryan Sheelen, Airport Planner IV, City of San Jose Planning and Development  
Division and  
Mark Connolly, Senior Planner, Santa Clara County Department of Planning  
and Development

**SUBJECT:** Airport Department Comments on the Lafayette Project

## COMMENTS:

On April 6, 2022, Ashley Gutierrez, Planner II, California Energy Commission (CEC) staff, communicated with Ryan Sheelen, Airport Planner for the City of San Jose Airport Department, and Mark Connolly Senior Planner with Santa Clara County Airport Planning Department, regarding the Lafayette Backup Generating Facility (LBGF) and associated Lafayette Data Center (collectively the "project"). Staff provided Mr. Sheelen and Mr. Connolly with project links to the LBGF Small Power Plant Exemption (SPPE) docket log where revised drawings for the below grade emergency generator fuel tanks and the revised Federal Aviation Administration (FAA) Determination of No Hazard for project structures had been recently submitted. Staff also notified city and county airport staff that the applicant was in the process of preparing a thermal plume analysis.

On May 11, 2022, Mrs. Gutierrez informed Mr. Connolly and Mr. Sheelen that the applicant's thermal plume analysis was under review with CEC Air Quality staff. In response, Mr. Sheelen stated following his review, he had concerns with the thermal plume analysis because the plumes must be analyzed against aircraft on departure procedures, arrival procedures, and general aviation aircraft in the Mineta San Jose International Airport's traffic pattern which routes over the project site. He stated that the applicant's submitted analysis references Australian aviation documents and guidance, which is not acceptable. He explained the FAA released a Draft Advisory Circular 150/5190-4B Airport Land Use Compatibility Planning (June 2021) and once finalized, the Draft AC would replace AC 150/5190-4A, Model Zoning Ordinance to Limit Height of Objects Around Airports (December 1987), and the Interim Guidance on Land Uses Within a Runway Protection Zone (September 2012). The draft AC, under 2.2.2.8.2 Atmospheric Interference, states when evaluating the potential impact of the exhaust plume(s), airport owners/operators, should consider the traffic pattern, approach and departure corridors, and any existing planned flight procedures. It also features the FAA's official endorsement of the MITRE Corporation (MITRE) Exhaust Plume Analyzer model. He requested to review a thermal plume analysis that follows the FAA's guidance using the MITRE model with consideration of the airport's existing flight pattern and procedures.

Staff informed Mr. Sheelen we would prepare a follow-up data request to the applicant for the incorporation of the MITRE model and consideration of the airport's arrival and departure procedures and traffic pattern in a supplementary plume analysis per his comments.

## REFERENCES:

Federal Aviation Administration. Draft Advisory Circular 150/5190-4B, Airport Land Use Compatibility Planning, June 22, 2021. Available online at:  
[https://www.faa.gov/airports/resources/advisory\\_circulars/index.cfm/go/document.information/documentID/1](https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.information/documentID/1)

Federal Aviation Administration. Memorandum: Technical Guidance and Assessment Tool for Evaluation of Thermal Exhaust Plume Impact on Airport Operations. September 24,

2015. Available online at:

[https://www.faa.gov/airports/environmental/land\\_use/media/technical-guidance-assessment-tool-thermal-exhaust-plume-impact.pdf](https://www.faa.gov/airports/environmental/land_use/media/technical-guidance-assessment-tool-thermal-exhaust-plume-impact.pdf)

MITRE Corporation. Exhaust Plume Analyzer. Available online at:

<https://www.mitre.org/research/technology-transfer/technology-licensing/exhaust-plume-analyzer>

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<b>cc:</b>	<b>Signed:</b>  s  _____ <b>Name:</b> Ashley Gutierrez, Planner II
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