

DOCKETED

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**CALIFORNIA
ENERGY COMMISSION**



April 28, 2023

Martin Avenue Properties, LLC
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, California 95608

Data Requests Set 2 for Martin Data Center (22-SPPE-03)

Dear Mr. Galati:

Pursuant to California Code of Regulations, title 14, section 15084(b) and title 20, section 1941, the California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 2, which is necessary for the staff analysis of the Martin Data Center and Backup Generating Facility (MDCBGF or project). The project would include one four-story data center building, an onsite substation and onsite switching station, generator equipment yard, surface parking and landscaping, and a recycled water pipeline extension.

This Data Request Set 2 seeks further information in the areas of air quality and transportation, based on the contents of the application submitted thus far. While CEC staff has made a concerted effort to capture all outstanding data needs, additional subsequent data requests in these, and other resource areas are possible, based on further information received or as necessary for a complete analysis of the project.

To assist CEC staff in timely completing its environmental review and to meet the requirements of CEQA (see Cal. Code Regs., tit. 14, §§ 15108, 15109), CEC staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please send written notice to me within 10 days of receipt of this letter.

If you have any questions, please email me at eric.veerkamp@energy.ca.gov.

Eric Veerkamp
Project Manager

Enclosure: Data Requests Set 2

AIR QUALITY

Authors: Brewster Birdsall, Joseph Hughes

BACKGROUND: Construction Fugitive Dust Impact Modeling

The SPPE application in Table 34 and Table 35 of the Air Quality and Greenhouse Gas Technical Report (11/8/2022; TN# 247329) and the ambient air quality impact dispersion modeling data provided electronically do not address the fugitive dust emissions (PM10 and PM2.5) during the demolition and construction phases of the project. As such, the application does not fully quantify impacts to or demonstrate compliance with National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) during demolition and construction for the combined effects of construction equipment exhaust and fugitive dust. CEC staff needs the ground-level impacts of PM10 and PM2.5 with fugitive dust to determine compliance with NAAQS and CAAQS during the demolition and construction.

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1. Please update the criteria air pollutants ambient impact analysis for the construction-phase to quantify the PM10 and PM2.5 impacts for the 24-hour and annual averaging periods, including fugitive dust and construction equipment exhaust.
2. Please describe the modeling assumptions of the source parameters (e.g., initial dimension and release height of area/volume sources, or stack height, diameter, temperature, and velocity of point sources) used in the dispersion modeling for fugitive dust during demolition and construction.

TRANSPORTATION

Authors: Andy Kosinski, Molly Riddle

BACKGROUND: FAA Regulations Compliance, Sight Distance, and VMT Reductions

The SPPE application indicates that the project would be constructed using cranes that may exceed the final building height, may alter curb striping along Martin Avenue, and may be operated by staff proposed to work on a 4-40 (4-day, 40-hour work week) schedule. To provide clarification and aid staff analysis for compliance with Federal Aviation Administration (FAA) regulations (14 CFR, Section 77.5 et. seq), site access and driveway sight distance, and the anticipated VMT reductions from implementation of a 4-40 work schedule, CEC staff requires complete descriptions of construction equipment and built structure heights, the proposed allocation of curb space frontage, and staff and visitor roles.

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3. Please provide a description and site plan of the maximum height to which cranes, or other construction apparatuses will extend during project construction and operation, for use in the discussion of project compliance with FAA regulations (14 CFR, Section 77.5 et. seq).
4. Please provide a detailed description of the staff types eligible for a 4-40 schedule for reference in the discussion about vehicle miles traveled (VMT) analysis and measures proposed for inclusion in the project's Transportation Demand Management (TDM) Plan. The SPPE Application – Part I, Section 4.17.2.b notes that a 4-40 schedule would be proposed to reduce project VMT. Please clarify whether staff and visitor roles mentioned in the application (i.e., Data Center Operations, Security, Janitor, Tenant Personnel, Visitors) have varying degrees of compatibility with a 4-40 schedule.

BACKGROUND: Site Access and Circulation

The SPPE application indicates that project construction would entail connecting to an existing water line in the Union Pacific Railroad (UPRR) right-of-way and may involve other activities that would encroach on the Martin Avenue right-of-way. The application also indicates there are two driveways serving the project though three are shown on the site plan, and there is a discrepancy in the indicated automobile parking spaces. The application also indicates that security staff may be shared with other nearby data center sites and may park elsewhere when reporting for work, and that the Santa Clara Fire Department would review the fire access and hydrant plan and provide requested changes to the site plan for the project to implement. CEC staff requires confirmation of the extent to which construction activities would impact traffic operations on Martin Avenue, the purpose of and vehicle access control to be implemented at the center driveway on Martin Avenue, the number of automobile parking spaces provided, the extent to which security staff would be shared among Vantage data center sites in the area, and whether the Santa Clara Fire Department has provided input on the current site plan. This will enable CEC staff to understand and analyze the adequacy of site access and circulation throughout project construction and operation as well as the vehicle miles traveled (VMT) implications of project operations.

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5. Please provide a description, and site plan diagram if available, of the extent to which construction activities, including connecting to the existing buried water line east of the site within the UPRR right-of-way, would impact use of the Martin Avenue right-of-way. Useful context includes, but is not limited to, the extent, frequency, and timing of lane closures required during construction phases. If this information is not ready, please confirm if the project will develop a construction plan to comply with local ordinances).

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6. Please confirm whether security personnel would be shared with other Vantage data center sites within the area and may be expected to park at those sites when reporting for work.
7. Please confirm the purpose of the 16-foot-wide center driveway on Martin Avenue shown on site plans as well as the type of vehicle access control (e.g., gate) to be installed in this location and, if applicable, truck turning movements for access to and from this driveway. This driveway is noted on site plans but excluded from project narratives and no truck turning movements are shown for this driveway.
8. Please confirm the number of vehicle parking spaces on site. The SPPE application mentions 92, yet only 87 are included on the site plan. Please also indicate the number of accessible parking spaces if this differs from the one regular accessible space and one van accessible space shown on the site plan.
9. Please confirm that the project will not contain any short-term bicycle parking spaces.
10. Please confirm whether the Santa Clara Fire Department has reviewed the site plan to ensure fire protection design features are incorporated and adequate emergency access is provided; if this has occurred, provide a description of the department's requested changes to the site plan.
11. Please provide a detailed description and site plan indicating the proposed curb striping for Martin Avenue adjacent to the project frontage for use in the discussion about site access and driveway sight distance. Please show the extent of each type of curb striping (e.g., red – no parking or stopping, white – passenger loading, yellow – commercial loading, blue – ADA accessible parking, green - parking) proposed by the project.