



HEXAGON TRANSPORTATION CONSULTANTS, INC.

August 17, 2017

Mr. Paul Manzer
Navix Engineering Inc.
11400 SE 8th Street, Suite 345
Bellevue, WA 98004



Re: Parking Study for Data Centers in Santa Clara, California

Dear Mr. Manzer:

Hexagon Transportation Consultants, Inc. has conducted parking counts for two data centers in Santa Clara, California. The purpose of the counts was to determine the maximum demand for parking.

The two data centers counted are located at 2045 Lafayette Street, Santa Clara (323,122 Square feet) and 2220 De La Cruz Boulevard, Santa Clara (365,489 Square feet). The parking counts were conducted every hour between 8:00 AM and 6:00 PM on August 8, 2017 (Tuesday), August 9, 2017 (Wednesday) and August 10, 2017 (Thursday).

The average number of cars parked every hour was calculated at each site (see Table 1). The peak hour occurs when the most number of cars are present at the site. The peak hour of parking demand for 2045 Lafayette Street was at 1:00 PM with an average of 71 cars parked at the site. The peak hour of demand for 2220 De La Cruz Site was at 10:00 AM with an average of 79 vehicles parked on site. The results of the parking study are presented in Table 1.

**Table 1
Summary of Parking Count**

Time	Parked Cars							
	2045 Lafayette Street				2220 De La Cruz Boulevard			
	8/8/2017	8/9/2017	8/10/2017	Average	8/8/2017	8/9/2017	8/10/2017	Average
	Tuesday	Wednesday	Thursday		Tuesday	Wednesday	Thursday	
8:00 AM	58	54	56	56	67	69	70	69
9:00 AM	60	55	58	58	71	71	73	72
10:00 AM	58	56	62	59	83	74	81	79
11:00 AM	59	51	56	55	81	76	81	79
12:00 PM	56	51	54	54	75	69	71	72
1:00 PM	63	75	74	71	70	68	84	74
2:00 PM	65	71	68	68	71	68	76	72
3:00 PM	53	65	67	62	72	60	63	65
4:00 PM	50	52	61	54	51	53	57	54
5:00 PM	32	35	41	36	41	49	52	47
6:00 PM	24	32	36	31	27	30	34	30
Size (s.f)	323,122				365,489			
Highest Parking Ratio (veh/ ksf)	0.22				0.22			



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The parking demand per 1,000 square feet was calculated by dividing the peak average demand for parking by the square footage of each building. Both 2045 Lafayette Street and 2220 De La Cruz sites had a peak demand of 0.22 parking spaces per 1,000 feet.

We appreciate this opportunity to submit this report. Please do not hesitate to contact us if additional information is needed.

Sincerely,
HEXAGON TRANSPORTATION CONSULTANTS, INC.

A handwritten signature in black ink, appearing to read "Gary K. Black", with a long horizontal flourish extending to the right.

Gary K. Black
President

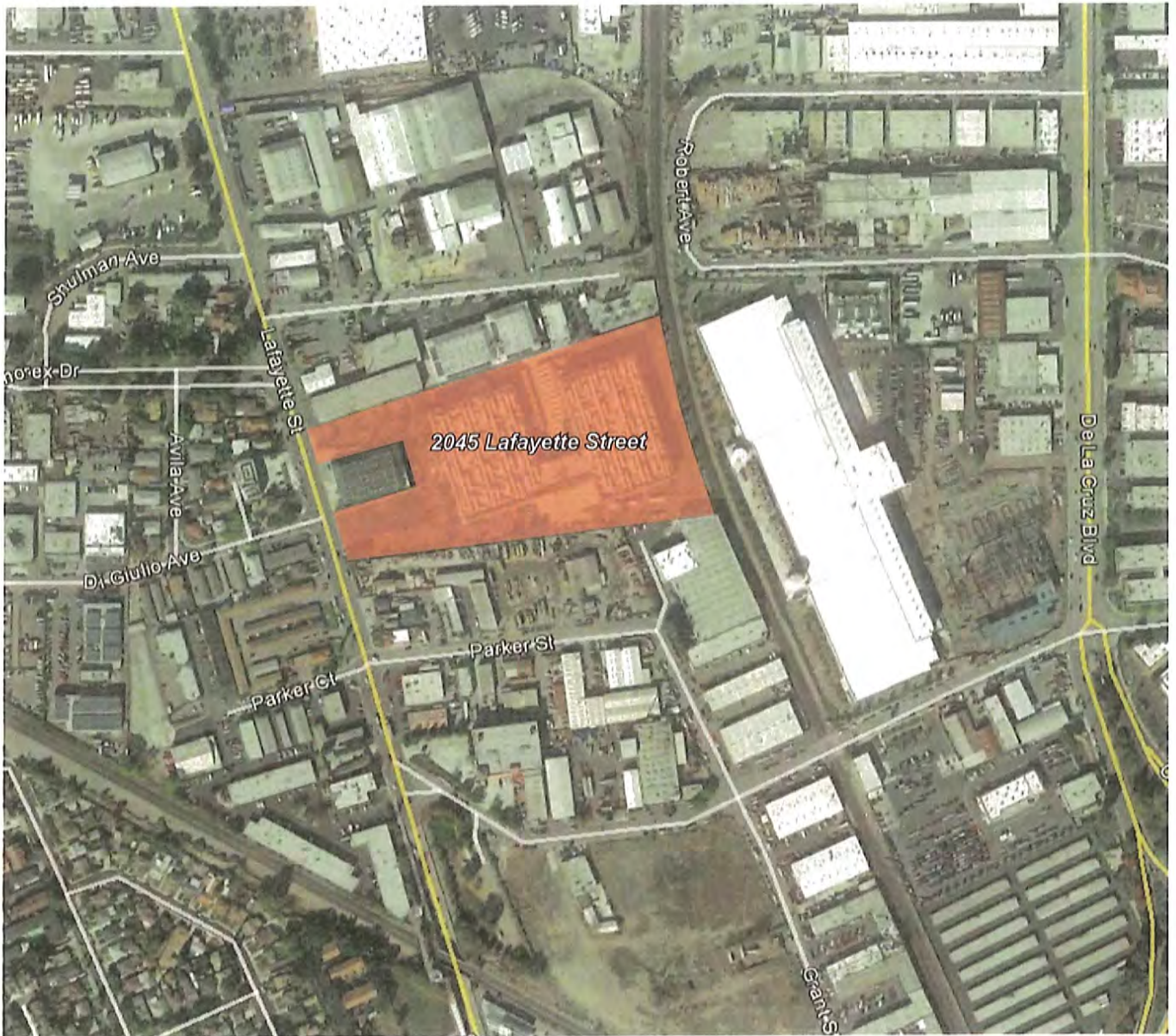


Figure 1
Site Location



Figure 2
Site Location

The following
items were
received after
packets were
distributed.

Keyon, David

From: Mark Espinoza <esp_jkclaw@yahoo.com>
Sent: Friday, October 06, 2017 10:23 AM
To: Keyon, David
Subject: Re: comments in opposition to 237 Industrial APN: 015-31-054

ORGANIZACION COMUNIDAD DE ALVISO

October 6, 2017

OCA supports and seconds all comments submitted by other agencies and individuals on the Draft EIR. Having reviewed the responses to those comments in the Final Revised EIR, we have the following concerns.

Traffic

Even if SB 743 may technically not require a Transportation Demand Analysis at the present time, a TDA is necessary to meaningfully evaluate the project's impacts on traffic and circulation, as the Caltrans comment obviously suggests. The City should produce a TDA that evaluates whether Project-generated VMT per capita will be greater than 15% below baseline city-wide or regional values. If VMT will exceed this amount, mitigation will be required.

Since there will be significant impacts to the STN, Caltrans recommended the applicant make a "major contribution" to the SHOPP, for use in the future. The Final EIR dismissed this recommendation on grounds that mitigation would require freeway widening, which this Project alone cannot be required to fund or implement, and that the SHOPP program is voluntary. However, to the extent that a fair share contribution to the SHOPP could reasonably promote mitigation of this significant impact in the future, it constitutes "feasible mitigation" under CEQA and must be implemented.

VTA made a similar comment on the Draft EIR, explaining that "voluntary contributions to regional transportation improvements can be included as mitigation measures in CEQA documents even in the absence of a comprehensive funding strategy as described." The Final EIR's dismissal of this comment with the conclusory statement that "a voluntary contribution would not be legally binding and therefore, cannot be considered mitigation under CEQA" is disingenuous. The City could easily incorporate such a contribution into its conditions of approval for the Project, thereby making it legally binding.

Greenhouse Gases

OCA concurs with the comments of Grasseti Environmental Consulting objecting to the lack of a project-specific GHG emissions analysis. The reliance on General Plan consistency to conclude satisfactory compliance with the City's GHG reduction strategy for build-out through 2020, and a finding of a significant and unavoidable impact thereafter, does not fulfill CEQA's mandate for good faith, reasoned analysis, or reflect a good-faith effort to "investigate and disclose all [the agency] reasonably can." As Grasseti observed, a project-level EIR may not use a finding of significant impacts from a program-level EIR covering an entire city and which includes no site- or project-specific information, as a substitute for conducting the project-specific analysis of impacts, and identifying project-specific mitigation. In other words, the lack of project-specific analysis has led improperly to a failure to consider and implement feasible mitigation measures to reduce GHG emissions by the Project itself.

Air Quality/Health Risk/Noise Impacts from Truck Traffic

The EIR states: "It is expected that the majority of truck traffic generated by the project would originate from and utilize SR 237. The project truck routes would not include Los Esteros Road into Alviso." Alviso has a long record of experiencing truck traffic through its residential areas, despite repeated claims by industrial projects in the past that truck traffic would only use 237. OCA has submitted abundant documentation to the City of San Jose of truck traffic through its streets over the past several years.

Given that it is reasonably foreseeable - and indeed highly likely -- that this Project, with 108 truck loading bays under the light industrial option, will cause trucks to try to bypass congestion on Hwy 237 by traveling on surface streets through the Alviso community.

The City should require the developer to evaluate not only the traffic impacts of this likely outcome but, more importantly, the direct and cumulative health risks to sensitive receptors in the community, including children and the elderly, from truck-related diesel exhaust emissions over the lifetime of the Project.

Health Risks to Alviso Students at New Agnews School

The Santa Clara Unified School District is scheduled to break ground 2019 on a new K-12 campus at 3500 Zanker Road, near the project site. Neither the Draft nor Final EIR appear to mention, let alone evaluate, potential impacts to the several hundred students at this school, including impacts from diesel particulate and other toxic air contaminant emissions from either the data center generators or

the large volume of trucks driving to and from the Project site, including along Zanker Road. The City needs to prepare and circulate a health risk assessment for future students and staff at this school of the direct and cumulative risks from exposure to airborne toxics.

Alternatives

As the environmentally superior alternative under CEQA, OCA joins Caltrans to urge the City adopt this alternative. Development under this alternative would be consistent with the City's General Plan; would not result in greater greenhouse gas (GHG) emissions impacts, conforming to the City's GHG Reduction Strategy; result in less soil disturbance; and generate less traffic.

There is insufficient compelling evidence in the EIR to support the conclusion that this alternative does not meet the objectives of the project and does not wholly mitigate the project's impacts. As Caltrans noted, partial mitigation is preferable to no mitigation whatsoever (i.e., a determination of "significant and unavoidable") and complete mitigation not required for this alternative to be considered a viable alternative.

Thank You

Mark Espinoza

OCA President

On Oct 6, 2017, at 10:13 AM, Mark Espinoza <esp_jkclaw@yahoo.com> wrote:

Fyi can you reply that you have received.

Begin forwarded message:

From: Mark Espinoza <esp_jkclaw@yahoo.com>
Subject: Re: comments in opposition to 237 Industrial APN: 015-31-054
Date: October 6, 2017 at 10:07:14 AM PDT
To: Kieulan Pham <kieulan.pham@sanjoseca.gov>

Hi Kieulan,

Attached is OCA's opposition of the proposed development 237 industrial SCH# 2016052053

Please reply once received.

<ME comments to Planning Commission.pages>