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MANAGEMENT  
DISTRICT  
SINCE 1955

October 21, 2010

Payal Bhagat  
Assistant Planner II  
City of Santa Clara Planning Division  
1500 Warburton Avenue  
Santa Clara, CA 95050

Subject: 3105 Alfred Street Data Center Proposed Mitigated Negative Declaration/Initial Study

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Dear Ms. Payal Bhagat:

Bay Area Air Quality Management District (District) staff has reviewed your agency's Mitigated Negative Declaration/Initial Study (MND) for the 3105 Alfred Street Data Center (Project) located in the City of Santa Clara (City). We understand that the Project will re-use a vacant 49,858 sq. ft. building as a data center with four data server rooms. The building will be renovated to accommodate a new data center, which will include six 2 megawatt (MW) diesel generators and one .23 MW diesel generator to provide standby power in the event of a utility power outage. If the Project is approved, an authority to construct/permit to operate will need to be obtained from the District for operation of the generators.

District staff has the following specific comments on the Project's environmental analysis.

**Greenhouse Gas Emissions Analysis**

District staff understands that the City chose to utilize a qualitative analysis of greenhouse gas (GHG) emissions and thresholds of significance. The City would consider a project to have a significant impact in regards to GHG emissions if it were to (1) increase emissions over business as usual (BAU) conditions in the industry; and (2) conflict with AB 32 (pg. 39 in the MND). However, the Air Resources Board's Scoping Plan states that statewide GHG emissions need to be reduced by 28% from BAU emissions projected for 2020 to achieve the AB 32 target of 1990 emissions by 2020. Therefore the two thresholds utilized by the City appear to conflict with each other, since maintaining BAU emissions would not achieve the AB 32 target. Furthermore, the MND indicates a 30% reduction in GHG emissions will be achieved from BAU by comparing the Project's emissions from a Silicon Valley Power (SVP) power mix with proposed LEED efficiency measures versus the average energy mix for the State of California with no LEED efficiency measures. As stated in Appendix C-1 of the MND, electrical power would be obtained from SVP and therefore the SVP power mix should be used as the baseline for project emission calculations. In addition, the MND does not include calculations that depict how emission reductions were determined for

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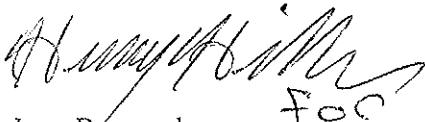


LEED efficiency measures. For these reasons, we believe the MND does not satisfactorily demonstrate that GHG emission associated with the Project would be less than significant.

The City should consider all feasible measures for reducing GHG emissions. Pacific Gas & Electric (PG&E) has a number of programs, including "Nonresidential New Construction" and "Savings by Design", which offer technical assistance and monetary incentives for energy efficient designs in new construction projects in high-tech facilities that increase operational efficiency and reduce energy costs (<http://www.pge.com/hightech/>). Additionally, the Environmental Protection Agency (EPA) has an EnergyStar Program targeted on data centers that includes tools and resources for benchmarking energy performance and implementing energy efficiency improvements. We recommend that the City, at a minimum, consider the following measures: achievement of the EPA's EnergyStar rating for new data centers, adoption of energy-efficient servers, use of improved efficiency chillers, fans, and pumps, combined heat and power (CHP), the use of fuel cell technology and on-site renewable energy ([http://www.energystar.gov/index.cfm?c=prod\\_development.server\\_efficiency](http://www.energystar.gov/index.cfm?c=prod_development.server_efficiency)).

District staff is available to assist the City staff in addressing these comments. If you have any questions, please contact Jackie Winkel, Environmental Planner, (415) 749-4933.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Susan Garner  
BAAQMD Director Ash Kalra  
BAAQMD Director Liz Kniss  
BAAQMD Director Ken Yeager