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October 15, 2010

Kim Abbott
Department of Energy
Office of Science
Berkeley Site Office
Lawrence Berkeley National Laboratory
1 Cyclotron Road, MS 90-1023
Berkeley, CA 94720

Subject: Draft Environmental Assessment for Computational Research and Theory Facility Project

Dear Mr. Abbott:

Bay Area Air Quality Management District (District) staff reviewed the Department of Energy's (DOE) Draft Environmental Assessment (EA) for the Computational Research and Theory Facility Project (Project). Staff understands that the DOE has already completed CEQA review for this Project and is now completing documents for NEPA review. The Project would relocate and expand existing Lawrence Berkeley National Laboratory (LBNL) activities to a facility on or near the LBNL site. The Project would entail the construction of a 140,000 square foot building or the renovation of an existing building.

The EA determined that there would be no potential significant impacts, including no impacts due to greenhouse gas (GHG) emissions, from the Project. This determination was not based on BAAQMD thresholds because the Project analysis began before the BAAQMD Board of Directors adopted these thresholds on June 2, 2010.

BAAQMD staff understands that the DOE intends to require the Project to meet LEED Gold standards, implement an employee transportation demand management program and to procure energy from energy sources that exclude coal through the Western Area Power Administration (WAPA). However, the Project will still have a large energy demand and associated GHG emissions.

Staff urges the DOE to commit to all possible steps to minimize these impacts. In order to further reduce the Project's GHG emissions, staff recommends that DOE commit to the following additional measures as a condition of Project approval:

- Adding on-site renewable energy sources, such as wind, solar panels, or other alternative energy technology, and committing to powering a specific percentage of the Project with this renewable energy source.
- Meeting LEED Platinum green building standards.
- Employing the most energy-efficient computer servers, and using server consolidation and virtualization as possible.

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Please contact BAAQMD's engineering staff to determine if any permits are needed for potential new stationary source equipment at 415-749-4990 or <http://www.baaqmd.gov/Divisions/Engineering/Application-Forms.aspx>.

District staff is available to assist DOE staff in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Vice-Chairperson Tom Bates
BAAQMD Director Scott Haggerty
BAAQMD Director Jennifer Hosterman
BAAQMD Director Nate Miley