



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

August 13, 2020

Tiffany Vien, Assistant Planner
Community Development Department
City of Santa Clara
1500 Warburton Avenue
Santa Clara, CA 95050

RE: Memorex Data Center – Notice of Preparation

Dear Ms. Vien,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Memorex Data Center (Project). The Project applicant proposes to demolish the existing improvements on the 9.18-acre site at 1200-1300 Memorex Drive in Santa Clara to construct a four-story, 472,920 square foot data center building with an attached six-story, 87,520 square foot ancillary use office and storage component. Although the data center would be designed to provide 60 megawatts (MW) of information technology power, the Project would have a total of 24 three-MW diesel-fueled generators, of which 16 generators would be providing 48 MW of backup power generation capacity and eight generators would be providing redundancy.

The Air District has worked for many years to improve air quality and health in Santa Clara County and continues to do so today. Since the Project is located in an area that has long been disproportionately impacted by air pollution and is identified as a priority community through our Community Air Risk Evaluation (CARE) program and by the State of California as a Senate Bill 535 disadvantaged community, the Air District is concerned about the potential for any increase in emissions that could result from the Project. Specifically, the Air District is concerned about the 24 diesel-fueled backup generators that would be located on the south side of the building. Because residences are located downwind of the Project site, the Air District highly recommends that the City consider requiring the project proponent to use the cleanest available technologies such as solar battery power or fuel cells or, at a minimum, relocating the generators further away from residential receptors.

Air District staff recommends the EIR include the following information and analysis:

- **The greenhouse gas (GHG) impact analysis should include an evaluation of the Project’s consistency with the most recent draft of the AB 32 Scoping Plan by the California Air Resources Board and with the State’s 2030, 2045, and 2050 climate goals.** The current recommended GHG thresholds in the Air District’s 2017 CEQA Guidelines are based on the State’s 2020 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32.

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The EIR should demonstrate how the Project will be consistent with the Scoping Plan as well as the State's long-term climate goals. This includes an evaluation and discussion of how the GHG emissions associated with the electricity used by the data center and diesel fuel combusted by the back-up power generators are consistent with the State's goal of carbon neutrality no later than 2045.

- **The EIR should estimate and evaluate the potential health risk to existing and future sensitive populations within and near the Project area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the Project's construction and operation.** Air District staff recommends that the EIR evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on sensitive receptors within and near the Project area.

- **The EIR should evaluate all feasible measures, both onsite and offsite, to minimize air quality and GHG impacts.** The EIR should prioritize onsite measures, followed by offsite measures, within the Project area. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
 - Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>) and the commitment by Mayor Lisa Gillmor of City of Santa Clara to meet this goal.
 - Implementing green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and/or fuel cells or solar PV back-up power with battery storage capacity.
 - Joining Silicon Valley Power's (SVP) Santa Clara Green Power program and thus committing to the purchase of 100 percent renewable energy, or negotiating an electricity contract with SVP for 100 percent renewable energy.
 - Implementing best available industry energy efficiency practices to achieve a power usage effectiveness (PUE) rating of 1.2 or lower.
 - Requiring construction vehicles to operate with the highest tier engines commercially available.
 - Creating a construction phase traffic management plan that reduces diesel equipment idling.
 - Supporting zero-emission vehicles via provision of electric vehicle (EV) charging, preferential parking for EVs, and/or neighborhood electric vehicle programs.
 - Creating a Transportation Demand Management Program that includes shuttles to nearby Caltrain stations, community shuttle/van services and car sharing, transit information and subsidies for employees, safe, convenient bicycle and pedestrian amenities with connections to nearby routes and activity centers, and further enhancements of active transportation initiatives, among others.
 - Procuring carbon offsets after implementation of all feasible onsite mitigation measures in order to eliminate remaining GHG emissions associated with construction and operation of the Project.

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- **The EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The EIR should discuss 2017 CAP measures relevant to the Project and show the Project's consistency with the measures. The 2017 CAP can be found on the Air District's website:
<http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
 - **The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website:
<http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.
If the Project requires a site-specific analysis, please contact Air District staff to obtain more recent data.
 - **Certain aspects of the Project may require a permit from the Air District (for example, back-up diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the EIR.
 - **The Project may require a Small Power Plant Exemption (SPPE) from the California Energy Commission (CEC).** Please contact the CEC to discuss potential SPPE applicability.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions or would like to discuss Air District recommendations further, please contact Josephine Fong, Environmental Planner, at (415) 749-8637 or jfong@baaqmd.gov, or Jakub Zielkiewicz, Advanced Projects Advisor, at (415) 749-8429 or jzielkiewicz@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Margaret Abe-Koga
BAAQMD Vice Chair Cindy Chavez
BAAQMD Director Liz Kniss
BAAQMD Chair Rod G. Sinks
Leonidas Payne, California Energy Commission