



July 19, 2017

Debby Fernandez
City of Santa Clara, Planning Division
1500 Warburton Avenue, Santa Clara, CA 95050

RE: MND/IS for the 1700 Russell Hydrogen Fuel Facility Project

Dear Ms. Fernandez,

Bay Area Air Quality Management District (Air District) staff has reviewed the City of Santa Clara's (City) Mitigated Negative Declaration (MND) and Initial Study (IS) for the 1700 Russell Hydrogen Fuel Facility Project (Project). The Project includes the installation of steam methane reformers, liquid hydrogen pumping equipment, and a central fill system which will produce, store and distribute gaseous hydrogen for use by Fuel Cell Electric Vehicles (FCEV). Delivery trailers will be used to transport the gaseous hydrogen produced on-site to hydrogen refueling stations in the San Francisco Bay Area and Northern California.

According to the IS, this Project is to be produced as part of California Energy Commission (CEC) efforts for building and establishing a hydrogen supply network to service the FCEV market in California. Hydrogen, compared to other currently utilized fossil fuels, has a lower carbon intensity and can result in a reduction in greenhouse gases of 40% to 50% when compared to conventionally fueled vehicles. These reductions in GHGs can be higher when hydrogen is produced from renewable sources like biomethane.

The Air District supports efforts to implement a regional hydrogen supply network for FCEVs to reduce GHG emissions associated with transportation sources, which represent the largest source of GHG emissions in the Bay Area. As outlined in the Air District's 2017 Clean Air Plan, the region's transportation sector must be transformed toward zero emission vehicles in order to meet 2050 climate stabilization goals and health-based ambient air quality standards. To achieve the greatest GHG emission reduction potential, Air District staff urges the City to prioritize the use of carbon-neutral renewable natural gas (RNG) to produce the hydrogen fuel. Also, as noted on pg. 26 of the IS, stationary air polluting equipment proposed to be installed on the Project site will be subject to the permit requirements of the Air District.

Thank you for the opportunity to provide comments in support of this Project.

Sincerely,

Jean Roggenkamp
Deputy Executive Officer

cc: Director Margaret Abe-Koga
Director Cindy Chavez
Chair Liz Kniss
Director Rod G. Sinks

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