



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

March 8, 2017

City of Santa Clara
Planning Division
Yen Han Chen, Associate Planner
1500 Warburton Avenue
Santa Clara, CA 95050

RE: Mitigated Negative Declaration for the McLaren Data Center Project

Dear Mr. Chen,

Bay Area Air Quality Management District (Air District) staff has reviewed the Mitigated Negative Declaration (MND) for the McLaren Data Center Project (Project). As noted in the MND, the project will require an Authority to Construct permit and a Permit to Operate from the Air District.

This Project includes the demolition of approximately 147,600 square feet of existing commercial and industrial buildings and their replacement with two four-story data center buildings with a gross area of 413,000 square feet. The project also includes a number of measures to reduce the air quality and greenhouse gas (GHG) impacts of the project, as listed in Table 3.0-3 of the MND, such as:

- Use of recycled water for the cooling towers and landscaping irrigation;
- Variable frequency drives for project chillers;
- Use of occupancy sensors for lighting;
- Electric vehicle charging for nine parking spaces;
- Post-consumer recycled content in hard floor surfaces, ceiling tiles, and raised access floor tiles; and
- Implementation of a Transportation Demand Management (TDM) program.

The analysis in the Mitigated Negative Declaration (MND) estimates that the Project will increase GHG emissions by 117,896 metric tonnes carbon dioxide equivalent (MTCO₂e) per year. The MND concludes that this GHG impact will be less than significant because the project “would not conflict with the Santa Clara CAP (Climate Action Plan) or other plans, policies or regulations adopted for the purpose of reducing the emissions of GHG” (p. 81). The Air District and the State of California have established a long-term GHG reduction goal of 40% below 1990 levels by 2030. The MND itself notes on page 72 that the project is not eligible to use the CAP to evaluate full-build emissions to determine its significance under CEQA, because the CAP is based on 2020 GHG reduction goals and this project will not be completed before 2023. Therefore, the MND does not appear to provide the substantial evidence needed to justify a less than significant determination.

Air District staff recommends that the City require that all new land use projects include the most efficient GHG reduction strategies available at the time of project approval and construction. This is needed to ensure that new development projects minimize GHG emissions to the fullest extent possible in order to make progress toward the State’s and Air District’s climate stabilization goals.

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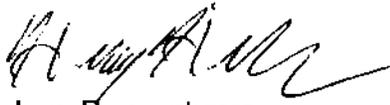
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The majority of this Project's GHG emissions are from electricity usage. While Silicon Valley Power has a relatively good mix of electricity from renewable sources, this Project could significantly reduce GHG emissions by purchasing all of its electricity from Santa Clara Green Power, which is available through Silicon Valley Power. The Project could further reduce its GHG impacts by installing solar panels over parking spaces and any roof area not being used for cooling towers or other equipment. Finally, the Project could be required to meet a Power Usage Effectiveness (PUE) of 1.2 or less, which would be both consistent with Measure 2.3 of the City's Climate Action Plan for extremely large power rack rating data centers and consistent with efficiencies achieved at other datacenters (e.g., Google).

Air District staff is available to assist the City in addressing these comments. For more information, or if you have any questions, please contact Karen Kristiansson, Principal Environmental Planner, at (415) 749-4753 or via email at kkristiansson@baqmd.gov.

Sincerely,



for

Jean Roggenkamp
Deputy Executive Officer

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