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STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of: Application For Small Power Plant Exemption for the **WALSH BACKUP GENERATING FACILITY**	**DOCKET NO. 19-SPPE-2** **DECLARATION OF JOE HUBBARD**

I, Joe Hubbard, declare as follows:

1. I am presently employed as with Senior Director, Design-Central & West Regions with Digital Realty.

2. A copy of my professional qualifications and experience is included with the previously filed Opening Testimony Package and is incorporated by reference in this Declaration.

3. I prepared the attached supplemental testimony relating to WDC energy use and PUE for the Application for Small Power Plant Exemption for the Walsh Backup Generating Facility (California Energy Commission Docket Number 19-SPPE-2).

4. It is my professional opinion that the attached prepared testimony is valid and accurate with respect to issues that it addresses.

5. I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed at Dallas, Texas on May 13, 2020.

Joe Hubbard

Joe Hubbard

STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of: Application For Small Power Plant Exemption for the **WALSH BACKUP GENERATING FACILITY**	**DOCKET NO. 19-SPPE-2** **DECLARATION OF GREGORY DARVIN**

I, Gregory Darvin, declare as follows:

1. I am presently the owner of Atmospheric Dynamics, Inc.

2. A copy of my professional qualifications and experience is included with the previously filed Opening Testimony Package and is incorporated by reference in this Declaration.

3. I prepared the attached supplemental testimony relating to Air Quality and Public Health for the Application for Small Power Plant Exemption for the Walsh Backup Generating Facility (California Energy Commission Docket Number 19-SPPE-2).

4. It is my professional opinion that the attached prepared testimony is valid and accurate with respect to issues that it addresses.

5. I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed at Carmel, California on May 13, 2020.

Gregory Darvin

STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of: Application For Small Power Plant Exemption for the **WALSH BACKUP GENERATING FACILITY**	**DOCKET NO. 19-SPPE-2** **DECLARATION OF MICHAEL LISENBEE**

I, Michael Lisenbee, declare as follows:

1. I am presently employed as Senior Project Manager with David J. Powers & Associates.

2. A copy of my professional qualifications and experience is included with the previously filed Opening Testimony Package and is incorporated by reference in this Declaration.

3. I prepared the attached Supplemental Testimony relating to Greenhouse Emissions for the Application for Small Power Plant Exemption for the Walsh Backup Generating Facility (California Energy Commission Docket Number 19-SPPE-2).

4. It is my professional opinion that the attached prepared testimony is valid and accurate with respect to issues that it addresses.

5. I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed at San Jose, California on May 13, 2020.

Michael Lisenbee

651 Walsh Partners, LLC
WALSH BACKUP GENERATING FACILITY
AIR QUALITY, PUBLIC HEALTH AND GREENHOUSE GAS EMISSIONS
SUPPLEMENTAL TESTIMONY

I. Name: Joe Hubbard
Michael Lisenbee
Gregory Darvin

II. Purpose:
Our testimony addresses the subjects of Air Quality, Public Health and Greenhouse Gas Emissions associated with the construction and operation of the Walsh Backup Generating Facility (WBGF) as described in the Application For Small Power Plant Exemption (SPPE), CEC Docket 19-SPPE-2.

III. Qualifications:

Joe Hubbard: I am presently employed as Senior Director, Design-Central & West Regions with Digital Realty, the managing partner of the 651 Walsh Partners, LLC (WP). I have been employed by Digital Realty for the past 8 years. I have a Bachelor of Arts Degree in Biology from Carson Newman University, and I have 26 years of experience developing critical infrastructure projects such as data centers.

I am the Project Manager for the WBGF and the Walsh Data Center. I caused to be prepared and reviewed the Application For SPPE, as well as the post-filing information, data responses, and supplemental filings.

Michael Lisenbee: I am presently employed as a Senior Project Manager at David J. Powers & Associates and have been for the past 13 years. I have a Bachelor's Degree in Environmental Studies from the University of California Santa Barbara and I have 13 years of experience in preparing and reviewing California Environmental Quality Act (CEQA) documents.

I have been engaged by WP to prepare the Application for SPPE for the WBGF and additional documents for docketing at the CEC. I managed the preparation of the Application for SPPE and reviewed and developed several related data responses.

Gregory Darvin: I am presently employed at Atmospheric Dynamics and have been for the past 19 years. I have a Graduate Degree in Atmospheric Science and I have 32 years of experience in air quality meteorology, dispersion model development and application, and air quality consulting.

I prepared the Air Quality and Public Health section of the Application For SPPE, as well as the post-filing information, data responses, and supplemental filings.

Detailed descriptions of our qualifications are presented in the resumes which was included in our previously filed Opening Testimony Package (TN 232680).

To the best of our knowledge all referenced documents and all of the facts contained in this testimony are true and correct. To the extent this testimony contains opinions, such opinions are our own. We make these statements and provide these opinions freely and under oath for the purpose of constituting sworn testimony in this proceeding.

IV. Exhibits

In addition to this written testimony, we will be sponsoring the exhibits listed on WP's Proposed Exhibit List which will be attached to its PreHearing Conference Statement.

V. Opinion and Conclusions

The Committee has posed the following questions relating to public health impacts.

Public Health Pertaining to Toxic Air Contaminants (TACs):

- ***In "Staff's Responses to Comments Received on the Initial Study," Staff states that it will work with BAAQMD staff to resolve BAAQMD's comments on the TACs analysis and Health Risk Assessment (HRA). Has Staff resolved BAAQMD's comments regarding whether the analysis of TACs and the HRA is correct? Explain.***

- ***If Staff has not resolved BAAQMD's comments on the TACs analysis and HRA, is the analysis nonetheless CEQA compliant and consistent with the BAAQMD methodology? Explain.***

Mr. Darvin provides the following response:

The TAC analysis and HRA that I performed, and upon which Staff relied are consistent with the BAAQMD methodology and comply with CEQA.

In March 2020, the BAAQMD updated their CEQA Tools to include a new "Permitted Stationary Sources Risk and Hazards GIS" map which provides the locations of stationary sources permitted by the District and conservative screening values for cancer risk, chronic hazard index and PM2.5 concentrations. While the tool has been updated, the BAAQMD CEQA methodology remains the same in that a new project should identify all background permitted sources within 1,000 feet and sum all of the sources' risk, PM2.5 and hazards for comparison to the cumulative thresholds. The GIS map tool was utilized for this project and the San Jose Airport is beyond 1,000 feet from the project site. Please see Attachment 1 which presents the results of the mapping tool. The data presented in Attachment 1 also demonstrates that all sources within 1,000 feet of the project site would result in cumulative risks less than the BAAQMD cumulative risk thresholds.

Additionally, the BAAQMD CEQA Guidelines for cumulative source impacts only require that the analysis be performed for sensitive receptors, which the BAAQMD identifies as residences, schools, day care, and hospitals. There are no sensitive receptors within 1,000 feet of the project site.

If we extend the radius around the project site to distances exceeding three thousand (3,000) feet and then you look at the cumulative operational impacts for toxics from the operations at the airport, the cumulative analysis has the total risk at 38 in a million and includes all background stationary sources, roads, highways, railways etc. that the BAAQMD requires for cumulative assessments. The maximum location is just west-southwest of the end of the southern edge of the runway. The Walsh project risk impact measured as cancer risk at that location is 0.017 in a million. Thus, the total combined project risk would be 38.017 in a

million risk, which is well below the BAAQMD 100 in a million cumulative risk significance level.

As an additional step, adding the Walsh maximum risk impact location (PMI) to the maximum airport risk impact location of 38 in a million (which is now based on two separate and distinct locations), the resulting total risk of 48 in a million is still well below the 100 in a million threshold.

This clearly demonstrates that when both of these projects are combined using the worst case assumption that, the maximum location from one project is added to the maximum location of the other project, the total cancer risk levels are still insignificant and are well below the BAAQMD cumulative risk significance level.

The Committee also requested the following be addressed for the area of Greenhouse Gas Emissions.

Greenhouse Gas (GHG) Emissions:

- ***What is the CEC's legal obligation to evaluate potential impacts of GHG emissions from the Project, including operations of the Data Center, beyond calendar year 2020? What thresholds of significance must or may be applied?***

- ***Were any of the methodologies or thresholds identified in CEQA Guidelines sections 15064.4 or 15183.5, or the BAAQMD CEQA Guidance used? If so, identify where, using reference to docketed documents specifying titles, transaction numbers and specific page numbers. If not, explain why and the legal significance, if any, of not including the methodologies or thresholds identified in CEQA Guidelines sections 15064.4 or 15183.5, or the BAAQMD CEQA Guidance.***

- ***Explain whether and how the goal identified in the City of Santa Clara's 2020 Climate Action Plan, for data centers to achieve a power usage effectiveness below 1.2, is applicable to and whether it is feasible for the Project?***

- ***If the GHG emissions impacts from Project operation are found to be significant, what, if any, mitigation measures could be adopted to bring the GHG emissions below the threshold of significance?***

Mr. Lisenbee provides the following testimony to which includes a discussion of the CEQA GHG emission guidance, a discussion of the significance thresholds and methodology employed, responses to the erroneous assertion that the project's emissions must be quantified out to the year 2050, and a response to the erroneous assertion that the WDC must comply with a PUE of 1.2.

CEQA GHG EMISSION GUIDANCE

Section 15064.4 (a) of the CEQA Guidelines outlines the obligation for a CEQA lead agency to evaluate GHG emissions. Specifically, it provides:

> A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to ***describe, calculate or estimate the amount*** of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
>
> (1) Quantify greenhouse gas emissions resulting from a project; and/or
> (2) Rely on a qualitative analysis or performance based standards.

Section 15064.4 (b) states, "The agency's analysis should consider a timeframe that is appropriate for the project."

Therefore, the CEC has an obligation to ***describe, calculate or estimate the amount of GHG emissions*** resulting from the WBGF and the WDC and consider a ***timeframe that is appropriate for the project***. However, the agency has the ultimate discretion to quantify the greenhouse gas emissions or rely on a qualitative or performance based standards. As explained below, the SPPE Application and IS/MND use both methods of evaluation.

CEQA directs agencies to evaluate not only the potential direct impacts from a project but also those that are an indirect result of the project. Specifically, Section 15064 (d) provides:

(d) In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider ***direct physical changes*** in the environment which may be caused by the project and ***reasonably foreseeable indirect physical changes*** in the environment which may be ***caused by the project. (Emphasis added)***

(1) A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project. Examples of direct physical changes in the environment are the dust, noise, and traffic of heavy equipment that would result from construction of a sewage treatment plant and possible odors from operation of the plant.

(2) An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment. For example, the construction of a new sewage treatment plant may facilitate population growth in the service area due to the increase in sewage treatment capacity and may lead to an increase in air pollution.

(3) An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable.

In this case, the GHG emissions from the WBGF generators are ***direct physical changes in the environment.*** However, the vast majority of the project's GHG emissions are not directly emitted from either the WBGF or the WDC. Rather the WDC's consumption of electricity results in the generation of electricity from a various combination of electrical generation

assets owned, or contracted by Silicon Valley Power. Although SVP provides an annual estimate of its overall GHG emissions factor associated with electricity generation, it is impossible to determine which generation assets at which locations will result in the GHG emissions associated with this project. Further, the 2017 BAAQMD CEQA Guidelines define GHG emissions from electricity consumption as indirect emissions.[1]. Therefore, the vast majority of GHG emissions are treated as ***indirect physical changes in the environment.***[2]

Section 15183.5 of the CEQA Guidelines outlines the methods for tiering and streamlining the analysis of greenhouse gas emissions. This provision allows lead Agencies to adopt qualified GHG Reduction Strategies that analyze the cumulative GHG impacts within their jurisdiction and then tier the environmental review of future development projects from this cumulative analysis. An example of this is the City of Santa Clara's Climate Action Plan (CAP), which analyzed the City's GHG emissions through the year 2020 and established measures for individual development projects to implement to ensure the City as a whole would meet its obligation to reduce GHG emissions consistent with statewide goals. Individual projects consistent with the CAP would be assumed to have a less than significant GHG impact. However, because the City's CAP only analyzed emissions to the year 2020, it was not relied upon for tiering of GHG analysis for this project, since this project would be constructed after the year 2020. Instead, the project's consistency with the CAP was discussed in the SPPE and IS/MND in the context of the project's overall consistency with relevant plans and policies.

CEQA GHG IMPACT EVALUATION METHDOLOGY EMPLOYED

To determine whether GHG emissions result in a significant impact Section 15064.4 (b) provides:

> A lead agency should consider the following factors, among others, when determining the significance of impacts from greenhouse gas emissions on the environment:

[1] 2017 BAAQMD CEQA Guidelines, Page 4-5.

[2] TN 228877-2, SPPE Application, page 106, TN 232078, IS/MND, page 5.8-8 through 5.8-11.

(1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b)). Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

The SPPE Application and the IS/MND comply with all three directives in Section 15064.4 (b) while still treating the GHG emissions from the WBGF as direct impacts and the GHG emissions from electricity generation as indirect impacts of the WDC.

1. The SPPE Application and the IS/MND quantify the direct and indirect GHG emissions to extent feasible.

a. Direct GHG emissions from the WBGF are quantified based on worst case maintenance and testing operations on an annual basis.[3]
b. The direct impacts from construction and demolition activities of the WDC are quantified and estimated on an annual basis.[4]
c. The worst case indirect GHG emissions associated with the WDC's maximum electricity demand are quantified and estimated on an annual basis.[5] Since these emissions are not emitted from WBGF or WDC equipment, the SPPE Application and IS/MND make assumptions based on SVP's published power mix using its average CO2e per MWh.[6]
    i. As explained in TN232977, WP, LLC Supplemental Data Responses, and incorporated into this testimony the BAAQMD's comment that the project must quantify and evaluate emissions to the year 2050 is an incorrect application of caselaw. Neither the State's CEQA Guidelines nor BAAQMD's CEQA Guidelines require that a project's emissions be compared to 2050 statewide targets, or that a project show at the time of approval it will meet those targets 30 years into the future.

       First the BAAQMD relies on caselaw[7] that is not applicable to a data center project. The case relied upon involves a long-term regional development plan for the San Diego area that was intended to guide the area's transportation infrastructure from 2010 to 2050. A programmatic CEQA approach was used to assess the impacts of that plan from 2010 to 2050 including an estimate of GHG emissions if the plan were implemented. In the case of that plan, the specific transportation-related actions of the plan are laid out and therefore the GHG emissions from each action can be estimated over the planning horizon. The GHG emissions from actions laid out in the San Diego

[3] TN 228877-2, SPPE Application, page 105, TN 232078, IS/MND, page 5.8-8.

[4] TN 228877-2, SPPE Application, page 105, TN 232078, IS/MND, page 5.8-7.

[5] TN 228877-2, SPPE Application, page 105, TN 232078, IS/MND, pages 5.8-8 through 5.8-10.

[6] TN 228877-2, SPPE Application, page 105, TN 232078, IS/MND, page 5.8-9.

[7] (Cleveland Nat'l Forest Foundation v. San Diego Ass'n of Governments (2017) 3 Cal.5th 497, 516)

transportation plan are not speculative because they are "planned" and within the control of the agency implementing the plan. Therefore, it is reasonable to compare those emissions to goals and policies for GHG reductions over the same planning horizon. Additionally, because individual components of the plan would receive project-level approval throughout the planning horizon up to the year 2050, it is appropriate to analyze the plan's emissions against future targets and thresholds that would be in place when those project-level approvals occur and the individual components are constructed and become operational. Conversely, for a near-term development project such as a data center, it is more appropriate to discuss the project's consistency with existing local, regional, and statewide efforts to meet interim GHG targets as part of an overall strategy to achieve the 2050 reduction goal along a trajectory of continual emissions reduction.

Further quantification of the GHG emissions from SVP generation and procurement into the future cannot be performed without speculation on the specific power mix and the timing and modification of state plans applicable to the electricity sector.

Further, as explained in more detail in TN232977, a data center is a building and not a piece of equipment and therefore does not have a clear design life. This is different than how the electricity industry treats a power plant. A power plant is treated like a large piece of equipment and therefore is often assigned a design life, based on the expected date the primary components of the power plant must be replaced.

A data center building is supported by equipment (electrical switchgear, HVAC systems, building management computer hardware and software, etc.) all of which have different design life cycles and all of which can be replaced without a major redesign that a power plant would need to undergo. Since the data center is a

building that incorporates equipment, the life of a data center can be extended through proper maintenance and/or upgrade or replacement of the equipment. Therefore, it would be speculative to determine the lifespan of a typical data center as it would be largely driven by the economics of whether the building location and design continues to meet the demands of its tenants. Therefore, no arbitrary specific design life for purposes of quantifying emissions should be used, nor is necessary because CEQA allows an evaluation that is not limited to quantification.

2. The only relevant quantitative threshold of significance for GHG emissions that is applicable to the project is the 10,000 metric tons CO2e per year[8] threshold for stationary sources established in BAAQMD's 2017 CEQA Guidelines, which applies only to the direct emissions of the WBGF. This threshold was established by BAAQMD to capture 95 percent of the stationary source sector GHG emissions in the Bay Area. Both the SPPE Application and the IS/MND use the BAAQMD CEQA significance threshold for evaluation the GHG emissions from the WBGF and correctly determine that the direct GHG emissions are below the threshold of significance[9]. No further analysis is required.

   There is no published threshold of significance for indirect GHG emissions resulting from the generation of electricity to meet the WDC demands.
3. Because there is no published threshold of significance for indirect GHG emissions from the generation of electricity to meet the WDC demands, both the SPPE Application and the IS/MND used the third method of analysis contained in Section 15064.4 (b) (3). This methodology involved a detailed comparison of the WDC indirect emissions to "regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions"[10].

[8] 2017 BAAQMD CEQA Guidelines, Page 2-4.

[9] TN 228877-2, SPPE Application, page 105, TN 232078, IS/MND, page 5.8-7.

[10] TN 228877-2, SPPE Application, page 106 through 110, TN 232078, IS/MND, page 5.8-8 through 5.8-14.

a. The first comparison performed by the SPPE Application and the IS/MND is to the Santa Clara Climate Action Plan (CAP). Both determine the WDC would comply with the CAP. Intervenor Sarvey and BAAQMD incorrectly assert that the CAP requires the WDC to meet a PUE of 1.2. As identified in the SPPE Application, IS/MND, and Staff' Response to Comments, Measure 5.3 of the CAP does not require the WDC meet a PUE of 1.2. Measure 2.3 calls for completion of a feasibility study of energy efficient practices ***for new data center projects with an average rack power rating of 15 kilowatts or more to achieve a PUE of 1.2 or lower***. The project would have a rack power rating range of 4 kilowatts. This would be below the criteria in Measure 2.3, such that a formal feasibility study of energy efficient practices is not required, nor would a PUE of 1.2 be required.

   Additionally, as WP has engaged in further design of the WDC, its original estimate of expected PUE indicated in the SPPE Application, has been revised downward from 1.3 to between 1.18 to 1.23. Industry standards for 2019 according to a survey of the data center industry shows an average PUE of 1.67.[11]

b. With respect to the indirect GHG emissions from SVP's generation and/or procurement of electricity to serve the WDC, a proper analysis should consider whether the WDC prevents SVP from complying with state regulations and plans to reduce its GHG emission profile of its power mix. As the Commission is a main driver of GHG reduction goals for the electricity sector, it is well aware that the electricity sector's innovation is often driven by the provision of new generation sources. This is done by renewable procurement targets applied to utilities such as SVP and requirements that new non-renewable sources of electricity meet efficiency standards. Therefore, new electricity demand allows utilities to increase GHG free or GHG reduced sources of generation. This structure has made it possible for the State of California to meet its RPS goals and will be critical to meeting the future goals and policies that BAAQMD identifies. It is not required by CEQA, nor is it reasonable, to evaluate the

[11] TN 232968, Annual Data Center Survey Results, Uptime Institute, third bullet of key findings on page 4 of the pdf.

statewide goals for the electricity sector in a project level CEQA analysis for a data center, which does not generate its own electricity, and only indirectly results in GHG emissions from the consumption of electricity. The conclusion is simply that the WDC's demand for electricity does not prevent, and may likely contribute to, SVP's generation profile meeting the GHG and RPS goals of the State.

A proper analysis of whether the WDC would have a significant cumulative impact of GHG emissions should focus on SVP's GHG emission profile from the procurement and direct generation of electricity, which is exactly the approach taken in the SPPE Application and Staff's IS/MND.

The IS/MND correctly identifies that SVP has met, and trends indicate that it will continue to meet, whatever GHG emission reductions and power mix goals are adopted and enforced by the State of California.

CONCLUSION

In conclusion, the IS/MND has satisfied its legal obligation to ***describe, calculate or estimate the amount of GHG emissions*** by quantifying the direct GHG emissions from the WDC on an annual basis and the worst case annual GHG emissions from SVP's current power mix. Any further quantification of emissions from SVP's power mix into the future cannot be performed without speculation. However, it is reasonable and foreseeable that SVP will continue to meet State-mandated GHG reduction goals so that the GHG emissions from WDC would decrease. As a result, indirect GHG emissions from the WDC would by definition meet the State's long-term GHG reduction goals.

The analysis performed complies with the guidance provided in Section 15064.4 by using existing significance thresholds, and where no such thresholds exist, evaluating compliance with the Santa Clara CAP and the SVP's compliance with the statewide regulations and policies to reduce GHG emissions in the electricity sector. The GHG analysis contained in the IS/MND complies with CEQA.

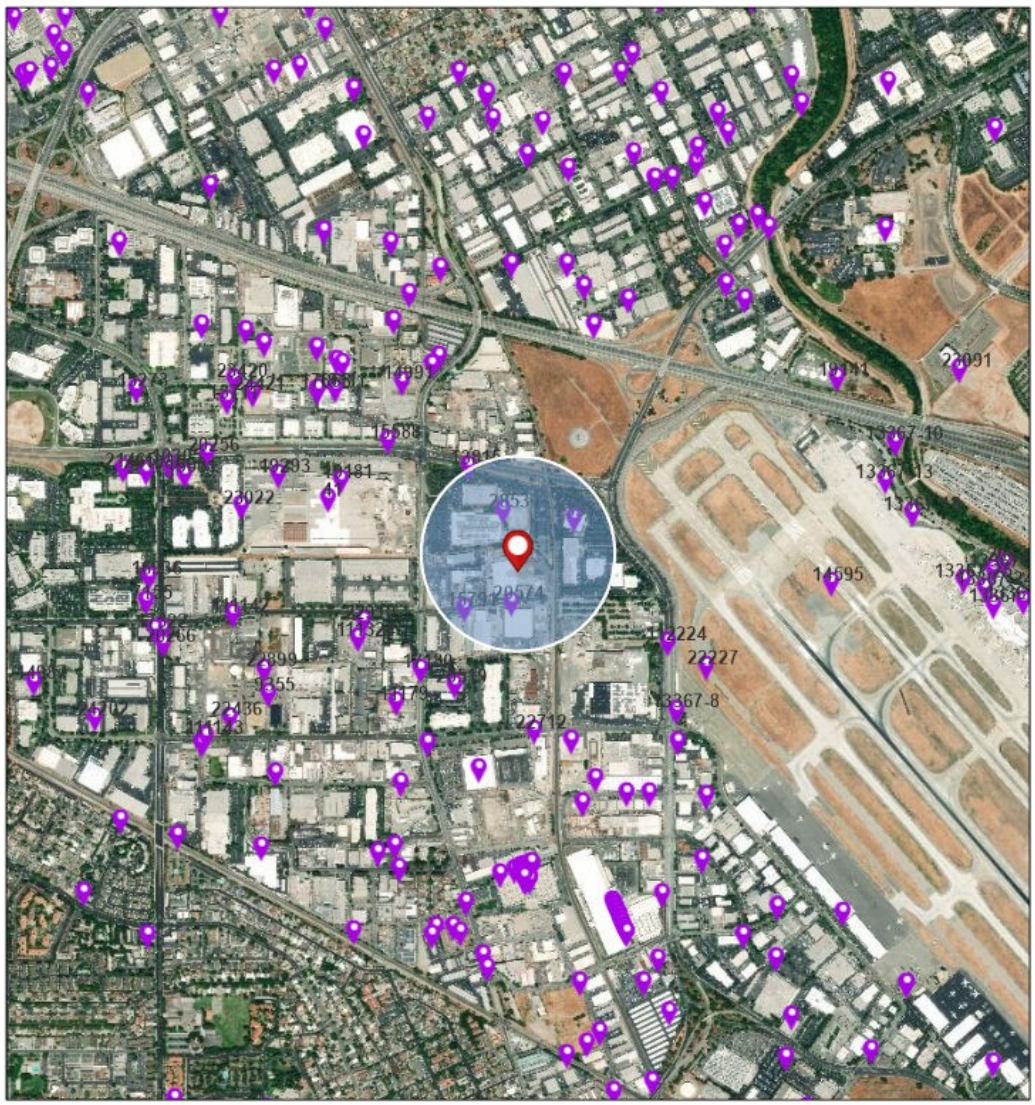
ATTACHMENT 1

Stationary Source Risk & Hazards Screening Report

Area of Interest (AOI) Information

Area : 3,134,508.74 ft²

May 7 2020 16:04:02 Pacific Daylight Time



Summary

Name	Count	Area(ft²)	Length(ft)
Permitted Facilities 2018	4	N/A	N/A

Permitted Facilities 2018

#	FACID	Name	Address	City	St
1	2853	Spray Technology	701 Comstock Street	Santa Clara	CA
2	15791	Global Satcom Technology	701 Walsh Avenue	Santa Clara	CA
3	20574	2805 Lafayette	2805 Lafayette Street	Santa Clara	CA
4	23373	W L Gore & Associates Inc	2890 De La Cruz Blvd	Santa Clara	CA

#	Zip	County	Cancer	Hazard	PM_25	Type	Count
1	95054	Santa Clara	0.010	0.000	0.010	Contact BAAQMD	1
2	95050	Santa Clara	0.000	0.000	0.000	Contact BAAQMD	1
3	95050	Santa Clara	3.920	0.010	0.000	Contact BAAQMD	1
4	95050	Santa Clara	0.000	0.000	0.000	Contact BAAQMD	1

Note: The estimated risk and hazard impacts from these sources would be expected to be substantially lower when site specific Health Risk Screening Assessments are conducted.

The screening level map is not recommended for evaluating sensitive land uses such as schools, senior centers, day cares, and health facilities.