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Project Title:	Laurelwood Data Center (MECP I Santa Clara I, LLC)
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Lisa Worrall
California Energy Commission
1516 9th St., MS-46
Sacramento, CA 95814

October 3, 2019

Subject: Laurelwood Data Center (19-SPPE-01) Comments on the Initial Study/Mitigated Negative Declaration

Dear Ms. Worrall,

MECP1 Santa Clara 1 LLC (the "Applicant") provides the following comments on the Initial Study/ Draft Mitigated Negative Declaration (IS/MND) for the Laurelwood Data Center (LDC).¹

Page 5.1-1, Aesthetics, Section 5.1.1 Setting – This section describes the project site as an 11.7-acre site. The actual area of the site is approximately 11.97 acres consistent with the square footage of 521,511 shown on Figure 4-3 of the IS/MND. (Applicant prefers the more generalized language of "approximately 12 acres.")

Page 5.4-10, Biological Resources, Section 5.4.2 Environmental Impacts and Mitigation Measures, Operation and Maintenance – The IS/MND analyzes the project's potential nitrogen emissions (in a depositional form) with respect to the nearby San Tomas Aquino Creek, concluding that the impacts "would be negligible, at approximately 0.00 to 2.76 kilograms/hectare/year". The Applicant agrees with the conclusions in the IS/MND. The project's nitrogen emissions will not significantly impact biological resources. The Applicant provides the following additional analyses that support the conclusions in the IS/MND related to potential impacts on San Tomas Aquino Creek:

- The key inquiry in a nitrogen deposition analysis is whether there are nitrogen-sensitive habitats potentially affected. Nitrogen deposition has the potential to be detrimental only when deposited in nitrogen-sensitive habitats. As confirmed by the studies set forth in the Application for this Small Power Plant Exemption, there are no nitrogen-sensitive biological resources or habitat within the adjacent San Tomas Aquino Creek.
- The LDC standby generators will emit nitrogen in the form of oxides of nitrogen, which is not in a depositional form. The conversion of the gaseous nitrogen emissions to a depositional form requires sunlight, moisture, and time, precluding potential impacts for a location in such close proximity to the project site. Thus, the project-specific environmental conditions preclude the possibility of potentially significant nitrogen depositional impacts.

Please contact me at 916-286-0207 | Jerry.Salamy@jacobs.com or Matt Muell at 303-961-7965 | matt.muell@edgecore.com if you have any questions about the information contained in this submittal.

Regards,



Jerry Salamy
Jacobs, Principal Project Manager

¹ TN#: 229584.