

**DOCKETED**

<b>Docket Number:</b>	19-SPPE-01
<b>Project Title:</b>	Laurelwood Data Center (MECP I Santa Clara I, LLC)
<b>TN #:</b>	230329
<b>Document Title:</b>	Letter Regarding Laurelwood BAAQMD Santa Clara CAP as an Exhibit for Robert Sarvey
<b>Description:</b>	Exhibit 402 Laurelwood BAAQMD Santa Clara CAP letter
<b>Filer:</b>	Robert Sarvey
<b>Organization:</b>	Robert Sarvey
<b>Submitter Role:</b>	Intervenor
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November 20, 2013

Payal Bhagat  
Assistant Planner II  
City of Santa Clara  
1500 Warburton Avenue  
Santa Clara, CA 95050

Subject: City of Santa Clara Climate Action Plan

Dear Ms. Bhagat,

Bay Area Air Quality Management District (Air District) staff has reviewed the City of Santa Clara's (City) Climate Action Plan (Plan). The Plan defines the City's strategy to address climate change and contains measures to avoid, reduce, and sequester greenhouse gas (GHG) emissions. Air District staff commends the City's initiative in addressing GHG emissions and supports the City's efforts in developing a Climate Action Plan. Air District staff has the following specific comments on the City's Plan.

We commend the City for including local actions, that when coupled with state actions, will help Santa Clara achieve its 2020 goal of reducing GHG emissions by 15 percent below 2008 emission levels. In fact, the City anticipates that it will surpass its goal and achieve a 24 percent reduction in GHG emissions by 2020. However, in order to meet the State's and Air District's climate stabilization goal of an 80 percent reduction below 1990 levels by 2050 (Executive Order S-3-05, Resolution), California will need to explore all feasible avenues to achieve significant emission reductions. In this spirit, we have identified additional feasible measures that have proven effective at reducing GHG emissions in other jurisdictions and are not included in the Plan. Air District staff recommends that the Plan strengthen its GHG reduction approach in the following ways.

- 1) Expand Measure 1.1, Coal-free by 2020, to include increasing the City's renewable energy power mix beyond the requirements of the Renewable Portfolio Standard. We strongly commend switching from coal to natural gas; however, we encourage the City to commit to increasing the City's power mix from renewable resources to fifty percent or higher. In addition, we recommend that the City include more information on how the emission reductions were calculated for this measure to better understand the change in the City's power mix from 2008 to 2020.
- 2) Expand Measure 2.3, Data centers, to require existing, rather than just new, data centers to complete a feasibility study to achieve a power usage effectiveness rating of 1.2 or lower. Staff recommends that this measure also encourage and incentivize data centers to utilize alternatives to diesel powered back-up generators to reduce GHG emissions and other air pollutants from the testing and use of diesel generators.

- 3) Extend Measure 5.2, Alternative construction fuels, to prohibit the use of diesel generators and use on-site grid power at construction sites when feasible. Due to the high amount of future construction the City anticipates, prohibiting the use of diesel generators provides a significant opportunity to reduce GHG emissions as well as other air pollutants.
- 4) Expand Measure 7.2, Urban cooling for parking lots, to require the installation of cool roofs in new developments and to incentivize cool roofs for existing developments.

Staff supports the Plan's strong implementation program for annual reporting and monitoring. To further track the implementation of required measures in new projects, staff recommends that the City consider preparing a compliance checklist for new developments.

We commend the City for addressing the critical issue of climate change through local action. We believe that the City's Climate Action Plan will likely achieve its GHG reduction target and that the City will be in a good position to use the CAP as a tierable document under CEQA.

Air District staff is available to assist the City in addressing these comments. If you have any questions, please contact Sigalle Michael, Senior Planner, at (415) 749-4683 or smichael@baaqmd.gov.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

- cc: BAAQMD Director Cindy Chavez
- BAAQMD Chair Ash Kalra
- BAAQMD Director Liz Kniss
- BAAQMD Director Jan Pepper