



May 15, 2018

Steve Le
Assistant Planner
Community Development Department
1500 Warburton Avenue
Santa Clara, CA 95050

RE: Supplemental Memo for 2305 Mission College Boulevard Data Center Project

Dear Mr. Le,

The 2305 Mission College Boulevard Data Center Project Initial Study/Mitigated Negative Declaration (IS/MND) was circulated for public comment on March 2, 2018. During the circulation period, four comment letters were received. Responses to comments were provided to the City of Santa Clara prior to the Architectural Review Committee hearing on April 18, 2018.

After the project was approved at the Architectural Review Committee hearing, appeals were filed by two parties, Lozeau Drury LLP and Adams Broadwell Joseph and Cardozo. The Lozeau Drury appeal form did not raise any new issues not already addressed in the responses to comments prepared prior to the Architectural Review Committee hearing. Similarly, the appeal form from Adams Broadwell Joseph and Cardozo primarily restated their initial comments which already received responses. However, their appeal form also asserted that the City did not provide direct responses to an appendix to their comment letter. The appendix to their comment letter is a letter from Dr. Phyllis Fox that includes comments on the IS/MND. The main contents and assertions of the Fox letter were summarized in the comment letter from Adams Broadwell Joseph and Cardozo and, as such, were responded to in the responses to comments provided prior to the Architectural Review Committee hearing. A subsequent review of the Fox letter determined that all relevant assertions were responded to in the initial responses to comments, with the exception of a few specific comments that were not carried through to the comment letter from Adams Broadwell Joseph and Cardozo, as described below. This memo, which includes an attachment from the project's air quality consultant Illingworth & Rodkin, Inc., provides responses to comments in the Fox letter that previously did not receive direct responses.

Pages 14-16 of the Fox letter assert that the IS/MND did not evaluate ambient air quality impacts in the context of the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The IS/MND air quality analysis followed guidance provided in the BAAQMD CEQA Air Quality Guidelines. With the exception of carbon monoxide, these guidelines do not recommend dispersion modeling to address impacts to ambient air quality standards. In developing their thresholds of significance, BAAQMD recognizes that (page 2-1)...

“By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project’s contribution to the cumulative impact is considerable, then the project’s impact on air quality would be considered significant.”

For this reason, emission-based thresholds are used to judge a project’s impact with respect to ambient air quality standards. For fugitive emissions of particulate matter from construction, the application of BAAQMD-recommended best management practices is used to judge the significance, as is appropriate.

Page 19 of the Fox letter asserts that the IS/MND used the incorrect construction length to determine average daily emissions, which is incorrect. CalEEMod predicted annual emissions in tons and those values were divided by the number of workdays, which was reported as 336 days, and converted to average daily pounds emission in pounds per day. Table 2-1 (page 2-2) of the BAAQMD CEQA Air Quality Guidelines provide the recommended thresholds, which are “Average Daily Emissions (lb/day)” for construction-related impacts. Operational impacts are based on “Average Daily Emissions (lb/day)” and “Maximum Annual Emission (tpy).”

Page 19 of the Fox letter also asserts that the IS/MND should have relied on emissions calculations for the summer period instead of the annual period. As previously stated, BAAQMD CEQA Air Quality Guidelines provide the recommended thresholds, which are “Average Daily Emissions (lb/day)” for construction-related impacts. Operational impacts are based on “Average Daily Emissions (lb/day)” and “Maximum Annual Emission (tpy).” The commenter is suggesting that maximum summer day emissions should be used to judge the significance of the impacts, which is incorrect.

Page 20 of the Fox letter asserts that the IS/MND used incorrect equipment usage assumptions when calculating construction emissions. The CalEEMod modeling used average hours per day during each construction phase. Within a construction phase, the applicant provided the number of days during that phase equipment would be used and the hours per day when it is used. Average hours per day were computed by computing the total number of hours in a construction phase and dividing it by the number of days in that phase. The average hours per phase are typically less than the average hours per day provided because the equipment would not be used every day of that particular construction phase. The IS/MND, therefore, used correct equipment usage assumptions to calculate emissions.

Lastly, pages 32-33 of the Fox letter assert that the IS/MND did not contain an analysis of cumulative impacts. This assertion is incorrect. Cumulative impacts were analyzed in Sections 4.3, 4.7, and 4.18 of the IS/MND.

As demonstrated in the initial responses to comments provided prior to the Architectural Review Committee hearing, as well as this supplemental memo, comments included in letters received during public circulation and subsequent appeal forms do not present substantial evidence supporting a fair argument that the project would result in significant unavoidable environmental impacts and, therefore, an EIR is not required for the project.

Sincerely,

A solid black rectangular box used to redact the signature of Michael Lisenbee.

Michael Lisenbee
Senior Project Manager

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M E M O

Date: May 15, 2018

To: **Michael Lisenbee**
David J. Powers and Associates
[REDACTED]

From: James A. Reyff
Illingworth & Rodkin, Inc.
[REDACTED]

RE: 2305 Mission College Blvd Data Center Project (formerly Aligned Data Center)

SUBJECT: Response to Additional Comments on Air Quality by Adams Broadwell...
Job#17-069

This memo addresses technical comments regarding the air quality study for the 2305 Mission College Blvd Data Center Project, formerly referred to as the Aligned Data Center. This air quality study was prepared by Illingworth & Rodkin, Inc., dated April 20, 2017. Comments were made by Adams Broadwell Joseph & Cardoza, dated April 12, 2018.

This memo responds to additional comments made by Phyllis Fox, PhD, PE, dated April 7, 2018. We addressed specific comments that you requested responses, as many other comments were addressed in our responses dated April 17, 2018 or were responded by others.

These are responses to the comments:

1. Comment: Pages 14-16: Analysis of ambient concentrations (NAAQS and CAAQS). The Commenter claims that the IS/MND air quality analysis did not evaluate ambient air quality impacts because it only compared emissions to significance thresholds.

Response: The IS/MND air quality analysis followed guidance provided in the BAAQMD CEQA Air Quality Guidelines. With the exception of carbon monoxide, these guidelines do not recommend dispersion modeling to address impacts to ambient air quality standards. In developing their thresholds of significance, BAAQMD recognizes that (page 2-1)...

"...By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If

a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant."

For this reason, emission-based thresholds are used to judge a project's impact with respect to ambient air quality standards. For fugitive emissions of particulate matter from construction, the application of BAAQMD-recommended best management practices is used to judge the significance.

2. Page 19: Construction emissions averaging - 336 work days divided by 365 calendar days to arrive at average? The commenter claims that construction is expected to last for 336 days, not 365 days. Thus, average daily emissions are underestimated as annual emissions should have been converted to daily by dividing by 336 days.

Response: CalEEMod predicted annual emissions in tons and those values were divided by the number of workdays, which was reported as 336 days, and converted to average daily pounds emission in pounds per day. Table 2-1 (page 2-2) of the BAAQMD CEQA Air Quality Guidelines provide the recommended thresholds, which are "Average Daily Emissions (lb/day)" for construction-related impacts. Operational impacts are based on "Average Daily Emissions (lb/day)" and "Maximum Annual Emission (tpy)."

3. Page 19: Construction emissions - annual vs summer output from CalEEMod. The commenter claims that most of the construction would occur in summer and therefore, use of annual emissions underestimates ROG emissions for both construction and operation.

Response: As previously stated, BAAQMD CEQA Air Quality Guidelines provide the recommended thresholds, which are "Average Daily Emissions (lb/day)" for construction-related impacts. Operational impacts are based on "Average Daily Emissions (lb/day)" and "Maximum Annual Emission (tpy)." The commenter is suggesting that maximum summer day emissions be used to judge the significance of the impacts.

4. Page 20: Table 2 paragraphs below – equipment usage discrepancies between CalEEMod and applicant provided spreadsheet (equipment hours per day, etc.). The commenter claims that the wrong number of hours per day that equipment would operate were used in the CalEEMod modeling.

Response: The CalEEMod modeling used average hours per day during each construction phase. Within a construction phase, the applicant provided the number of days during that phase equipment would be used and the hours per day when it is used. Average hours per day were computed by computing the total number of hours in a construction phase and dividing it by the number of days in that phase. The average hours per phase are typically less than the average hours per day provided because the equipment would not be used every day of that particular construction phase.